UNITED TECHNOLOGIES
PRATT&WHITNEY

400 Main Street
East Hartford, Connecticut 06108

February 7, 1995

TO: All holders of the Pratt & Whitney, East Hartford Contingency Plan

SUBJECT: Revision to the Contingency Plan

Enclosed, please find the revised Contingency Plan for the Pratt & Whitney East Hartford facility, dated January 20, 1995. Please replace the appropriate sections of your copy of this Contingency Plan, which is dated October 4, 1993. The relevent changes are as follows:

SECTION #	DESCRIPTION	PAGE	DATE OF REVISION
Cover Page	revised date		1/20/95
Table of Contents	renumbered pages, add Section IV - D	II-H-1 to 4	1/20/95
I	employee number, airport inactive	I-E-1	1-20-95
I	<90 Day storage locations - delete Airport and Colt St. oil tank	I-E-3	1-20-95
I	Update Figure 2 - Main Plant Storage Locations	I-E-5	1-20-95
I	Update Figure 3 - Colt Street Storage Locations	I-E-6	1-20-95
II	adjust duties of initial observer - delete 4 items	I-B-2	1-20-95
II	Duties of Incident Commander - reword to be consistant with regulations	I-B-3	1-20-95
II	Duties of Env. Coord. - reword item 8 assist Incident Commander	I-B-4	1-20-95
II	Notification Proceedures - added secondary Incident Commanders - delete Env. Coords. names -	I-B-7	1-20-95
II	add legal council pager number add Coast Guard to NRC phone number	II-B-8	1-20-95
II	add secondary ICs and delete Env. Coords.from personnel roster	II-B-12	1-20-95
IV	Spill Response Procedures item 7 - change reference to "17-H steel drum" to "an appropriate waste container"	I-D-12	1-20-95

SECTION	DESCRIPTION	PAGE	DATE OF REVISION
Fig. 1	Updated map of CWTP area for evacuation routes	Fig. 1	1-20-95
App. C	Emergency Equipment List - delete spill control equipment and PPE from CWTP-2 (area is inactive for waste storage), delete all emergency equipment listed for CWTP-4 (area has been demolished), add Chemfab Challenge 6000 Level A suits (2)	App. C	1-20-95

If you have any questions or require further information, please contact Glen D. Bianchi at 565-9342.

Sincerely,

Robert D. Rosenberg
Director - Facilities & Services

SECTION	DESCRIPTION	PAGE	DATE OF REVISION
V	Security System and Communications - delete "Environmental Coordinator" from reference to two-way radios, add "Environmental Coordinators are provided with Pagers."	II-C-1	1-20-95
V	Item D - add to protective clothing list "chemical protective suits up to level A"	II-C-2	1-20-95
V	Item E - Spill Control Equipment - add "CWTP Spill Response Vehicle"	II-C-2	1-20-95
VI	Incident Reporting Requirements - Add section D - Releases that require implementation of the Contingency Plan	II-J-1 II-J-5	1-20-95
VI	CERCLA Releases - completed information to find CERCLA 302.4 list add " no written report required for CERCLA reportable release"	II-J-2 II-J-3	1-20-95
VI	SARA Title III Releases - improved discussion of requirements for verbal notification added information required for verbal identification Improved discussion of requirements for written notification	II-J-4 II-J-4 II-J-4 to 5	1-20-95
VII	Arrangements with local Agencies - item C - clarified that EH paramedics be notified of "Medical" emergencies	II-O-1	1-20-95
VI	References to "Emergency Response Contractors" changed to "Emergency Spill Contractors"	II-O-2	1-20-95
App. B	Evacuation Plan - delete instructions for Airport Waste Storage Area	II-D-4	1-20-95
App. B	Clarify locations of exits in several areas	I-D-1 to 3	1-20-95

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Image Target Sheet

RDMS Document ID # 2337

Facility Name: PRATT & WHITNEY - MAIN STREET

Facility ID#: CTD990672081

Phase Classification: R-1B

Purpose of Target Sheet:

[X] Oversized (in Site File) **[ ] Oversized (in Map Drawer)**

[ ] Page(s) Missing (Please Specify Below)

[ ] Privileged **[ ] Other (Provide Purpose Below)**

Description of Oversized Material, if applicable:

DRAWING R8-92F-3: ENVIRONMENTAL COMPLIANCE MANUAL: CONCENTRATED WASTE TREATMENT PLANT EVACUATION ROUTES

[X] Map **[ ] Photograph** **[ ] Other (Specify Below)**

*** Please Contact the EPA New England RCRA Records Center to View This Document ***

1. Concentrated Waste Treatment Plant - Main Building (CWTP-1)

   A. SPILL CONTROL EQUIPMENT
      1. Spill Locker (see inventory this Section)

   B. COMMUNICATION EQUIPMENT
      1. Telephones
      2. PA System

   C. FIRE EXTINGUISHING EQUIPMENT
      1. 15-lb. carbon dioxide, first floor
      2. 2.5-gal. water, first floor
      3. 6-lb. ABC, second floor

   D. PERSONAL SAFETY EQUIPMENT

      1. Spill Locker (see inventory this Section)
      2. Scott Air Paks - two (2) on first floor; 30-minute duration
      3. Emergency shower
         a. Platform
         b. Outside office door
         c. Basement
         d. Laboratory
      4. Eye Wash Station
         a. Inside east door
         b. Basement
         c. Laboratory

2. Concentrated Waste Treatment Plant (CWTP) - Barrel Storage Building (CWTP-2) -- ***NOTE:*** This waste storage location is permanently inactive for waste storage. Miscellaneous equipment, empty transporters, and solid treatment chemicals are stored here (no liquids). Spill control equipment and personal safety equipment are no longer provided in this storage area.

   A. SPILL CONTROL EQUIPMENT (N/A)

   B. COMMUNICATION EQUIPMENT
      2. PA System Speaker

   C. FIRE EXTINGUISHER EQUIPMENT
      1. 30-lb. ABC, inside
      2. 6-lb. ABC, outside

   D. PERSONAL SAFETY EQUIPMENT *(N/A)*

3. Concentrated Waste Treatment Plant - Storage Building A (CWTP-5)

A. SPILL CONTROL EQUIPMENT
   1. Spill Locker (see Inventory this section)
   2. Emergency Response Spill Control Vehicle (see inventory this Section)
   3. Shovels and brooms

B. COMMUNICATION EQUIPMENT
   1. Telephone
   2. PA System speaker

C. FIRE EXTINGUISHING EQUIPMENT
   1. 30-lb. ABC, outside
   2. 6-lb. ABC, inside

D. PERSONAL SAFETY EQUIPMENT
   1. Spill Locker (see inventory this Section)
   2. Eye wash station - inside on west wall
   3. Emergency shower
   4. Respirators in employee lockers
   5. Chemfab Challenge 6000 Level A suits (2)

4. Concentrated Waste Treatment Plant - Storage Building B (CWTP-6)

A. SPILL CONTROL EQUIPMENT
   1. Spill Locker (see inventory this Section)
   2. Shovels and brooms

B. COMMUNICATION EQUIPMENT
   1. Telephone
   2. PA Speaker

C. FIRE EXTINGUISHING EQUIPMENT
   1. 30-lb. ABC, outside
   2. 6-lb. ABC, inside

D. PERSONAL SAFETY EQUIPMENT
   1. Spill Locker (see inventory this Section)
   2. Eye was station - inside on north wall
   3. Emergency Shower

5. Concentrated Waste Treatment Plant - Centralized Waste Storage and Transfer Facility (CWS&TF)

A. SPILL CONTROL EQUIPMENT
   1. Shovels and brooms
   2. Barrels
   3. Sawdust, absorbent material, and sodium bicarbonate

B. COMMUNICATION EQUIPMENT
   1. Telephones
   2. PA system

C. FIRE EXTINGUISHING EQUIPMENT
   1. Automatic sprinkler system (East side)
   2. Automatic foam system (West side)
   3. 30-lb. ABC's
   4. 6-lb. ABC's

D. PERSONAL SAFETY EQUIPMENT
   1. Full protective clothing, face shields, boots, aprons, gloves
   2. Emergency showers and eye wash stations

6. Colt Street Treatment Plant

A. SPILL CONTROL EQUIPMENT
   1. Shovels buckets and brooms
   2. Pump, hose, and wet-vac
   3. Sodium bicarbonate
   4. Oil absorbent material
   5. Decontamination Equipment

B. COMMUNICATION EQUIPMENT
   1. Telephone

C. FIRE EXTINGUISHING EQUIPMENT
   1. Fire hydrant and hoses
   2. Carbon dioxide extinguisher
   3. Dry chemical extinguisher
   4. 2-1/2 gallon water extinguishers

D. PERSONAL SAFETY EQUIPMENT
   1. Protective Clothing - Face shield, goggles, boots, gloves
   2. Shower and eye wash station

a. Main level - outside office
b. Lower level

3. Scott Air Paks - outside office

7. Other Less Than 90-Day Storage Areas (Main Oil House and Engineering Oil House)

The following emergency response equipment will be located in or near each of these areas.

A. SPILL CONTROL EQUIPMENT
1. Shovels and brooms
2. Barrels
3. Absorbent Material

B. COMMUNICATION EQUIPMENT
1. Telephone

C. FIRE EXTINGUISHING EQUIPMENT
1. 6-lb. ABC

D. PERSONAL SAFETY EQUIPMENT
1. Full protective clothing: face shields, boots, aprons, gloves

8. Spill Lockers

A. SPILL CONTROL EQUIPMENT
1. Long handled flat edged shovel
2. Spark proof shovels
3. Push broom, Corncob broom
4. Dustpan
5. Squeegee
6. 2-gal. plastic bucket
7. 2-gal. galvanized bucket
8. Sodium Bicarbonate
9. Sawdust
10. Sample Jars
11. pH paper

B. COMMUNICATION EQUIPMENT
1. Caution Tape
2. Clipboard with paper and marker

C. PERSONAL SAFETY EQUIPMENT
   1. Yellow Poly/Tyvek Suits
   2. White Saranex Suits
   3. Green acid resistant gloves
   4. Vinyl under-gloves
   5. Rubber overboots
   6. Face shields
   7. Duct tape

9. Emergency Response Spill Control Vehicle - CWTP-5

A. SPILL CONTROL EQUIPMENT
   1. Cyanide Hach test kit
   2. Hex chrome test kit
   3. pH paper
   4. Infrared thermometer
   5. 1-qt. sample jars
   6. Drum patch kit
   7. Bung wrench (non-sparking)
   8. Steel flat edge long handled shovel
   9. Spark-proof shovel
   10. Push brooms
   11. Corncob broom
   12. Squeegee
   13. Fiber drums
   14. Sawdust
   15. Sodium Bicarbonate
   16. 20-gal. fiber drum liners
   17. Small garbage bags
   18. Absorbent pigs
   19. Oil absorbent pads
   20. Dustpan
   21. Caution tape
   22. Sprayers
   23. Plastic buckets
   24. Mercury spill kit

B. COMMUNICATION EQUIPMENT
   1. Emergency Response Guidebook
   2. NIOSH Chemical Hazards book
   3. Hazardous Materials Pocket Guide
   4. Phone list
   5. Clipboard and pad

6. Notebook
7. Pen, Pencil
8. Markers: Black, White
9. PCB spill sign

C. PERSONAL SAFETY EQUIPMENT
1. Yellow Tyvek suits Level B
2. White Tyvek suits
3. White Tyvek coveralls
4. Rubber gloves
5. Plastic undergloves
6. Rubber overboots
7. Duct tape
8. 2 Scott Air Paks with 1-hour bottles
9. 2 Extra Scott interface pigtail cords

10. E.H. Mobile HAZMAT Van - Rescue 14

A. SPILL CONTROL EQUIPMENT
1. Sodium Bicarbonate
2. Sawdust
3. Pigs (for oils)
4. Pigs (for acids, caustics, and solvents)
5. Absorbent material (17" X 19" pads and roll)
6. Plastic shovels
7. Broom
8. Hand Broom and Dust Pan
9. Scoop
10. Expanding Pipe Plug
11. Chlorine cylinder repair kit
12. Leak seal kit
13. pH paper
14. Fiber drums
15. Hand Tools

B. COMMUNICATIONS EQUIPMENT
1. Megaphone
2. Radios
3. Cellular phone
4. Stantions
5. Yellow poly rope
6. Caution tape
7. Command post flag

8. Vests (Incident Commander, Safety Officer, and Environmental Officer)

C. FIRE EXTINGUISHING EQUIPMENT
   1. 5-lb. ABC
   2. 13-lb. Halon

D. PERSONAL SAFETY EQUIPMENT
   1. 2 Scott Air Paks (1-hour bottles)
   2. 2 Spare 1-hour air bottles
   3. Poly/Tyvek Suits
   4. Saranex Suits
   5. Green PVC Suits
   6. Trell-Chem Level A Suits
   7. Gloves: Neoprene, Latex, Vinyl
   8. Rubber knee boots
   9. Face shields
   10. Duct Tape
   11. Binoculars
   12. Liquid Soap
   13. Portable Generator
   14. Hand light

11. Equipment at Fire Department Garage

A. DECONTAMINATION EQUIPMENT
   1. Portable Shower: Plastic tubular overhead system with nozzles on a manifold that is placed over pools for personnel decontamination.
   2. Portable Pools: Three foot found plastic wading pools to contain the water from decontamination.
   3. Barrels: 32-gallon plastic drum for disposal of contaminated equipment.
   4. Pigs: used to create a berm around the decon area.
   5. Plastic Containment: Roll of 4-ft. wide and one piece 30' X 50' used as containment for decon.
   6. Wooden handle brushes: Used in scrub down during decon activity.
   7. Barrier Tape: Used to cordon off decon zone.
   8. Soap: One gallon of liquid concentrate for cleaning personnel during decon.

12. Outline of Emergency Equipment Capabilities

A. SPILL CONTROL EQUIPMENT
   1. Metal Shovel - Used for cleanup of non-ignitable or non-corrosive materials.
   2. Plastic Shovel (non-sparking) - Used when handling or working around ignitable or corrosive materials.

3. Brooms - Used for cleanup of spilled materials after being absorbed with sawdust or sodium bicarbonate.
4. Dust Pan - Used to collect sweepings to dispose of materials.
5. Squeegee - Used in cleanup of liquid spills.
6. Buckets - These are capable of being used for cleanup of spilled materials or as a wash bucket for decontamination. Plastic buckets are capable of containing corrosives. Galvanized buckets are capable of containing oils and solvents.
7. Sodium Bicarbonate - Capable of absorbing spilled materials and neutralizing acids and alkalis.
8. Sawdust - Capable of diking and absorbing petroleum products and water based materials.
9. Sample Jars - Used to collect samples of affected media to determine need for further remediation.
10. pH Paper - Capable of indicating pH to assist in evaluation of acids and alkalis.
11. Cyanide Hach Test Kit - Capable of indicating presence of cyanide in spilled material to assist in evaluating disposal options.
12. Hex Chrome Test Kit - Capable of indicating presence of hexavalent chrome in spilled material to assist in evaluating disposal options.
13. Drum Patch/Leak Seal Kit - Used to temporarily stop leakage. Kits contain an assortment of Wooden and rubber plugs, wedges, and mats.
14. Bug Wrench - Brass bung wrenches are non-sparking and may be used around ignitable materials.
15. Fiber Drums and Liners - Used for collection and disposal of spilled materials.
16. Pigs (sawdust) - Absorbent sock used to dike and absorb oils, fuels, solvents, and water based materials. Not for use on strong acids or alkalis.
17. Pigs (for acid, caustic, and solvent) - Absorbent sock filled with absorbent material used to dike and absorb acids, caustics, and solvents.
18. Absorbent Pads - 17" X 19" pads capable of absorbing oils, fuels, and solvents and repelling water. Used to cover drains and absorb oil off the top of water.
19. Expanding Pipe Plug: Capable of sealing the end of a leaking pipe.
20. Chlorine Cylinder Repair Kit: Used to repair leaks on 1-ton chlorine cylinders.
21. Hand Tools: Screw drivers, wrenches, etc. for various tasks.

B. COMMUNICATION EQUIPMENT

1. Caution Tape/Yellow Poly Rope: Capable of cordoning off hazardous areas.
2. Clipboard and Pad: Used for recording remediation and reporting information.
3. Reference Material: Hazardous material references are capable of providing information necessary for identifying proper protective clothing, and cleanup methods.
4. Markers Black/White: Used for proper labeling of waste drums.
5. PCB Spill Sign: Used to communicate PCB hazards at PCB spill sites.
6. Telephones: Used to notify Fire Department Dispatcher of an emergency incident.

7. PA System: Capable of communicating evacuation instructions where available.
8. Megaphones: Capable of communicating evacuation instructions where PA system are not available.
9. Radios: Used for communication between emergency response personnel during response activities.
10. Cellular phone: Used for communicating with outside agencies and notifying emergency responders.
11. Stantions: Used to support caution tape in cordoning off hazardous zones.
12. Command Post Flag: Capable of communicating center of operations and communications at an emergency incident.
13. Vests: Used to identify key personnel involved in emergency response.
14. Cones: Used to cordon off hazard zones and delineate decon areas.
15. Command Board: Used to track and communicate critical incident information.

C. FIRE EXTINGUISHING EQUIPMENT
1. CO2 Fire Extinguishers: Class BC for flammable liquids and electrical equipment.
2. Water Fire Extinguishers: Class A for wood, paper, and rags.
3. ABC Extinguisher: Suitable for use on ordinary combustibles, flammable liquids, and electrical equipment.
4. Halon: Suitable for use on ordinary combustibles, flammable liquids, and electrical equipment.

D. PERSONAL PROTECTION EQUIPMENT
1. Yellow Poly/Tyvek Suit: Capable of Level B protection from hazardous dusts, vapors, and many liquids. Not flame resistant.
2. White Tyvek Suits: Capable of Level C protection from hazardous dusts and vapors. Not for use when a high level of skin protection is required.
3. White Saranex Suits: Capable of Level B protection from hazardous dusts, vapors, and many liquids. Not flame resistant.
4. Nomex: Non-combustible and flame resistant to 220 degrees Celsius. Acid resistant.
5. PVC: Capable of Level B protection. Provides protection against acids and caustics.
6. Trell-Chem Level A Suits: Fully encapsulating, positive pressure suits capable of Level A protection. A spare 1/2 hour air cylinder is connected via a pressure hose to fill the suit with air, which will stop any vapors from entering the suit, should a leak develop from puncture or tear.
7. Chemfab Challenge 6000 Level A Suits: Fully encapsulating, positive pressure suits capable of Level A protection.
8. Vinyl Gloves: Resistant to abrasion, oils, acids, and alkalis.
9. Rubber Gloves: Resistant to acids, alkalis, oil, gasoline, and solvents.

10. Neoprene Gloves: Resistant to oils, greases, and strong chemicals. Superior wear resistance.
11. Rubber Boots: Resistant to acids, alkalis, oils, gasoline, and other solvents.
12. Duct Tape: Capable of taping gloves and boots on Level B suits.
13. Scott Air Paks: Capable of providing respiratory protection in all environments (30 or 60 minute bottles).
14. Respirators: Capable of respiratory protection up to the limits allowed by the cartridge being used. Cannot be used in Oxygen deficient environments.
15. Face shields: Provides eye and face protection from splashes.
16. Emergency Showers/eye washes: Capable of providing immediate cleansing of hazardous materials from skin and eyes.
17. Binoculars: Used to read markings on tanks, containers, or trucks from a safe distance.

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Facility Name: PRATT & WHITNEY - MAIN STREET

Facility ID#: CTD990672081

Phase Classification: R-1B

Purpose of Target Sheet:

[X] Oversized (in Site File) [ ] Oversized (in Map Drawer)

[ ] Page(s) Missing (Please Specify Below)

[ ] Privileged [ ] Other (Provide Purpose Below)

Description of Oversized Material, if applicable:

FIGURE D-2: ENVIRONMENTAL COMPLIANCE MANUAL: CONCENTRATED WASTE TREATMENT PLANT SPILL CONTROL AND EMERGENCY RESPONSE EQUIPMENT

[X] Map [ ] Photograph [ ] Other (Specify Below)

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or the potential for injuries, and the need for Industrial Hygiene & Safety personnel to provide ambient air monitoring for potential harmful releases.

- Notify the Dispatcher of the need for assistance from appropriate State and local agencies with designated response roles if their help is needed at the incident.
- As appropriate, mobilize waste treatment personnel to the scene.
- Identify the character, source, and extent of the fire, explosion, or release.
- Identify and assess hazards to human health and the environment working closely with the Environmental Coordinator and Industrial Hygiene and Safety staff, based on the location of the incident, the nature of the emergency, the material involved and amount, wind direction, injuries, and potential for further damage (fire, explosion, health effects, etc.)
- Assess and implement the required level of protection.
- Coordinate containment and mitigation of the release.
- Participate in post-emergency assessments and preventative measures.

4. Duties of the Environmental Coordinator

- Coordinate treatment and disposal activities.
- Advise the Incident Commander on technical issues, available remediation and clean-up procedures and capabilities, and on the need for outside environmental remediation assistance.
- Determine the proper spill control equipment for the specific emergency and compatibility of suppression or containment equipment/devices with the waste groups.

- Contact appropriate environmental remediation vendors for immediate emergency response if so directed by the Incident Commander.

- Participate in post-emergency assessments and preventative measures.

- Make all required emergency notifications to regulatory and community agencies as outlined in Section VI.

- Within 15 days after an incident occurs requiring the implementation of the Contingency Plan prepare and submit written reports as outlined in Section VI.

- Assist the Incident Commander in evaluating the extent of the damage, the potential for off-site impacts, and determining if the incident is beyond the capabilities of Pratt & Whitney personnel to sufficiently remediate.

- Make necessary notifications to senior management.

- Ensure that no waste that may be incompatible with the released material is treated, stored, or disposed in the affected area until cleanup procedures are completed.

- Ensure that all response equipment is cleaned and fit for intended use before normal operations are resumed.

- Notify the Regional Administrator and appropriate State and local authorities that the previous two items have been completed before resumption of normal operation.

- Update the operating record

5. Duties of the Security Force

When notified by the Pratt & Whitney Fire Department Dispatcher of the need for crowd or traffic control at a hazardous waste or material incident, the Security Communications Officer will immediately dispatch personnel to the scene to assist in maintaining order and a smooth

flow of emergency personnel and equipment in and out of the area.

6. Duties of the Medical Department

When notified by the Pratt & Whitney Fire Department Dispatcher of the need for medical assistance at a hazardous waste or material incident, the ambulance and its staff will immediately respond to the scene. Medical personnel are **NOT** to endanger themselves by entering and area where a hazard exists. Many fire fighters are trained as Emergency Medical Technicians and will evacuate any injured persons from the hazard area before the Medical staff will take over.

The Medical Department will notify the Environmental Coordinator or his alternate if it will be necessary to transport injured personnel to the area hospitals. Arrangements for transportation may be made by the Medical Department. Notification of the hospitals regarding the type of incident will be made by the Environmental Coordinator who will assure that an MSDS accompanies the patient to the hospital. Alternatively an MSDS may be faxed directly to the Emergency Room. Fax numbers are provided in the next section, "Notification Procedures."

7. Duties of Industrial Hygiene and Safety

When notified by the Pratt & Whitney Fire Department Dispatcher of the need for air monitoring at a hazardous waste or material incident, IH&S will immediately dispatch personnel to the scene to assist in monitoring the area to ensure that if evacuation of Pratt & Whitney personnel or the population of the surrounding community becomes necessary, the Incident Commander will be informed at the earliest possible moment.

C. NOTIFICATION PROCEDURES

The following reporting procedures are to be followed by Pratt & Whitney Personnel in the event of any spill, discharge, release or emergency incident involving any petroleum products, chemicals, hazardous material, or waste.

(1) Plant personnel who witness or have knowledge of any spill, discharge, release, or incident should immediately notify the Pratt & Whitney Fire Department by telephone using the emergency number:

5-1111

(2) The Fire Department Dispatcher will dispatch Fire Department personnel to the incident scene. An Incident Commander will be discharged immediately when warranted or when requested by the responding fire officer. An Incident Commander is available 24 hours per day, seven days per week, on site. The following individuals may serve as Incident Commander:

Primary Incident Commander	Captain Wallace E. Barton Jr.
Secondary Incident Commanders	Gregory J. Fellows Frank L. DeMaio Stephen Kajda Edward W. Smith Earl F. McFarland Kenneth L. Liappes John R. Damon Jason A. Isner John D. Battistoni George T. Bardell Warren E. Bristol III

(3) The Fire Department will notify the on-call Environmental Coordinator on the assigned pager.

(4) The on-call Environmental Coordinator will respond to the incident and determine if the incident could result in the release of hazardous waste or hazardous waste constituents to the environment in excess of a reportable quantity or if the Incident Commander has implemented the Contingency Plan.

(5) If necessary, the responding fire officer of Incident Commander shall notify the dispatcher of the need for assistance from:

Emergency Medical Service	Ext. 5-7736
Guard Headquarters	Ext. 5-6615
Industrial Hygiene & Safety	Ext. 5-3440
Waste Treatment	Ext. 5-4855

(6) Based upon the information provided, the Environmental Coordinator will determine whether or not the incident is reportable under federal or state regulations. Legal Counsel and Public Relations will be notified at the discretion of the Environmental Coordinator.

Public Relations	Mark Sullivan	Ext. 5-4415, Home 203-871-0461
Legal Counsel	Kevin M. Doyle	Ext. 5-2846, Pager 251-2025, Home 203-274-1178

(7) In the event of a reportable incident, the applicable agencies from the following list will be notified immediately by telephone by the Environmental Coordinator in accordance with Section VI.

Agency	Phone Number
National Response Center (EPA) & Coast Guard	800-424-8802
Department of Environmental Protection Oil and Chemical Spill Section	203-566-3338
East Hartford Local Emergency Planning Committee	203-291-7100 or 9-911
State of Connecticut Emergency Response Commission	203-566-4856

(8) The Incident Commander may request assistance from community response agencies listed below. Fax numbers for hospital emergency rooms are included and may be used to send MSDSs to the emergency room. Arrangements with the local authorities are described in Section VII.

Fire Services

East Hartford Fire Department
726 Main Street
East Hartford, CT. 06108

911 or 203-528-4171

Police Services

East Hartford Police Department
497 Tolland Street
East Hartford, CT. 06108
911 or 203-528-4171

Emergency Medical Services (EMS)

East Hartford Fire Department Paramedics
726 Main Street
East Hartford, CT. 06108
911 or 203-528-4173

Manchester Ambulance
134 East Center Street
Manchester, CT. 06108
203-643-1212

Professional Ambulance
130 Shield Street
West Hartford, CT. 06110
203-528-2812 or 203-247-4295

North Central Connecticut C-MED
263 Farmington
Farmington, CT. 06030
203-679-4124

Hospitals

Manchester Memorial Hospital
71 Haynes Street
Manchester, CT. 06040
203-647-4777 Ext. 2306 (Emergency)
203-647-6862 (FAX)

Hartford Hospital
80 Seymour Street
Hartford, CT. 06106
203-524-2525 (Emergency)
800-437-4378 (Life Star)
203-493-7581 (FAX)

Hospital Services (Cont'd)

St. Francis Hospital & Medical Center
114 Woodland Street
Hartford, CT. 06105
203-548-4001 (Emergency)
203-548-4662 (FAX)

Mount Sinai Hospital
500 Blue Hills Avenue
Hartford, CT. 06112
203-242-4431 (Emergency)
203-286-4718 (FAX)

(9) The Environmental Coordinator may request assistance from emergency response contractors listed below for assistance in spill cleanup and remediation. A description of arrangements with emergency response contractors is in Section VII.

Remediation Contractors

Tri-S Environmental Service
25 Pinney Street
Ellington, CT. 06029
800-828-7471

Clean Harbors, Inc.
60 Peter Court
New Britain, CT. 06051
203-224-7600

Sealand Environmental Services
49 Burtville Avenue
Derby, CT. 06418
203-735-1817

Asbestos Only

RAMCO
253 Locust
Hartford, CT. 06103
203-278-6196

D. PERSONNEL ROSTERS

1. Incident Commanders

Wallace E. Barton Jr.	P.O. Box 64 Andover, CT. 06232 Home 203-742-9829 Work 5-2268
Gregory J. Fellows	138 Summit Street Manchester, CT. 06040 Home 203-646-2661 Work 5-2391
Frank L. DeMaio	29 Crown Ridge Newington, CT 06111 Home 203-667-4135 Work 5-5907
Stephen Kajda	221 Rollingbrook Windsor, CT 06095 Home 688-5919 Work 5-5907
Edward W. Smith	524 Main Street Wethersfield, CT 06109 Home 563-3663 or 721-1952 Work 5-5907

Earl F. McFarland	5 Hartland Road Tariffville, CT 06081 Home 658-5269 Work 5-5907
Kenneth L. Liappes	287 Walsh Avenue Newington, CT 06111 Home 666-1152 Work 5-5907
John R. Damon	16 Wadsworth Street East Hartford, CT 06118 Home 568-4978 Work 5-5907
Jason A. Isner	398 Palisado Avenue Windsor, CT 06095 Home 688-8528 Work 5-5907
John D. Battistoni	212 New Road Avon, CT 06001 Home 693-2229 Work 5-5907
George T. Bardell	61 South Street Annex. Plymouth, CT 06782 Home 283-4258 Work 5-5907
Warren E. Bristol III	92 Stollman Road Colchester, CT 06415 Home 537-3653 Work 5-5907

III. DESCRIPTIONS AND QUANTITIES OF HAZARDOUS MATERIALS

A. Compatibility

An important aspect of handling hazardous materials is separation of incompatibles. Many hazardous materials, when mixed with other wastes or materials can produce effects which are harmful to human health and the environment, such as extreme heat or pressure, fire or explosion, violent reaction, toxic dust, mist or gases, or flammable fumes or gases. Table 1 categorizes general waste materials which are incompatible. The mixing of a material from one group with a material from another group may have the potential consequences noted.

B. Types of Wastes and Hazardous Characteristics

The hazardous waste handled at the East Hartford facilities have all been identified and characterized in accordance with applicable regulations. This information is located in the Operating Record located in the office of the CWS&TF. The hazardous characteristics of the various wastes fall into one more of the following categories:

Types of Hazardous Waste	EPA Hazard Code
Ignitable Waste	I
Corrosive Waste	C
Reactive Waste	R
Toxic Waste	T

Table 2 has been prepared to show the various waste stream types, each of which may contain several different constituents having the same hazard code(s). This table presents a general description of the types of waste, the hazardous characteristics, the hazard code, and the material comprising each waste stream type so that, when the Contingency Plan is implemented, the potential hazards for each situation can be readily assessed. A current inventory of regulated waste materials is accessible through the Industrial Waste Tracking System (IWTS) which is available at all times from any computer terminal throughout the facility.

C. Material Identification

Material and solutions used in the P&W East Hartford facility are identified by specific control numbers and markings. This marking system consists of PMC, PWA, & Ps identification systems. PMC - Process Material Control Number; PWA - Pratt & Whitney Aircraft Number; and PS - Process Solution Number. This information is contained in a hard bound book available to all fire department personnel, Emergency Coordinators and other staff. This information is also available in the MSDS computer system. Normally materials are stored in specific areas of the plant. The Pratt & Whitney Fire Department and the Environmental Protection Group staff have knowledge of these identification systems and storage areas which will help in the assessment of hazards.

Table 1

INCOMPATIBLE WASTE

Group 1-A	Group 1-B
Acetylene Sludge	Acid Sludge
Alkaline Caustic Liquids	Acid and Water
Alkaline Cleaners	Battery Acid
Alkaline Corrosive Liquids	Chemical Cleaners
Alkaline Corrosive Battery Fluid	Electrolyte, Acid
Caustic Wastewater	Etching Acid Liquid or Solvent
Lime Sludge & Corrosive Alkalis	Pickling Liquor and Corrosive Acids
Lime Wastewater	Spent Acid
Lime and Water	Spent Mixed Acid
Spent Caustic	Spent Sulfuric Acid

Potential Consequences: Heat Generation, Violent Reaction

Table 1 (Cont'd)

Group 2-A	Group 2-B
Aluminum	Any Waste in Group 1-A
Beryllium	or 1-B
Calcium	
Lithium	
Magnesium	
Potassium	
Sodium	
Zinc Powder	
Other Reactive Metals & Metal Hydrides	

Potential Consequences: Fire, Explosion, Generation of Flammable Hydrogen Gas

Group 3-A	Group 3-B
Alcohols	Any Concentrated Wastes
Water	in Groups 1-A or 1-B
	Calcium
	Lithium
	Metal Hydrides
	Potassium
	Other Water Reactive waste

Potential Consequence: Fire, Explosion, Heat Generation, Generation of Flammable or Toxic Gases

Table 1 (Cont'd)

Group 4-A	Group 4-B
Alcohols	Concentrated Group 1-A or 1-B Waste
Aldeehydes	Group 2-A Waste
Halogenated Hydrocarbons	
Nitrated Hydrocarbons	
Unsaturated Hydrocarbons	
Other Reactive Organic Compounds & Solvents	

Potential Consequences: Fire, Explosion, Or Violent Reaction

Group 5-A	Group 5-B
Spent Cyanide & Sulfide Solutions	Group 1-B Waste

Potential Consequences: Generation of Toxic Hydrogen Cyanide or Hydrogen Sulfide Gas

Group 6-A	Group 6-B
Chlorates	Acetic Acid & Organic Acids
Chlorine	Concentrated Mineral Acids
Chlorites	Group 2-A Waste
Chromic Acids	Group 4-A Waste
Hypochlorites	Flammable & Combustible Waste
Nitrites	
Nitric Acid, Fuming	
Perchlorates	
Permanganates	
Peroxides	
Other Strong Oxidizers	

Potential Consequences: Fire Explosion, or Violent Reaction

Table 1 (Cont'd)

Group 7-A	Group 7-B
Ammonia	Group 6-A Waste Iron, Galvanized Steel Copper, Brass, Bronze Gold, Mercury, Silver Halogens Sulfuric Acid Other Concentrated Mineral Acids

Potential Consequences: Explosion, Violent Reaction, Generation of Toxic Gases

TABLE 2
HAZARDOUS WASTE CHARACTERISTIC

Waste Stream	EPA Designation Type	Hazard Code	General Description	Contains
A	Toxic	T	Spent Halogenated Solvent	Tetrachloroethylene 1,1,1-Trichloroethane Trichlorotrifluoroethane
B	Ignitable and Toxic	I,T	Spent non-Halogenated Solvent	Acetone Isopropyl Alcohol Methyl Ethyl Ketone Toluene Xylene
C	Corrosive	C	Liquid with a pH > 12.5 or < 2.0	Acids, Alkalis
D	Reactive	R	Cyanide Waste Solution; Sulfur Solids and Aluminum Oxide powder	Sodium Cyanide Copper Cyanide Sulfur Solids Aluminum Oxide
E	Toxic	T	Wastewater Treatment Plant Sludge from electroplating operations	Metal Hydroxides
F	Miscellaneous Corrosive, Ignitable, and Toxic	I,T,C	Discarded or spilled Chemical products	Acids, Alkalis Solvent, Oxidizers

Hazard Code Key

I - Ignitability (Solvents)
Liquid with a flash point below 60 C (140 F)

C - Corrosivity (Acids, Alkalis)
Aqueous material with pH less than or equal to 2 or greater than or equal to 12.5

R - Reactivity (Cyanides Bearing Waste)
Cyanide or Sulfide wastes which, when exposed to pH conditions between 2 and 12.5 can generate toxic gases, vapors, or fumes.

T - Toxicity (Acids, Organics, Solvents, etc.)
These categories include a wide variety of organics and inorganics materials toxic to man by either short-term or long-term exposure as listed in federal regulations; a limited number of such wastes are generated at Pratt & Whitney.

The Fire Department Dispatcher, in addition to having the PMC, PWA, & PS reference manuals and this document, has trade name cross-reference manuals, CHRIS Manuals, the full NFPA and F.M. Data Code Sheets, as well as an extensive library of other reference materials.

All tanks and containers used for storage of hazardous waste are clearly marked and labeled. The markings and labels provide information which may be used to obtain additional detailed information regarding the constituents present in the waste.

IV. EMERGENCY RESPONSE PROCEDURES

A. Implementation

The decision to initiate an emergency response, "Notification of the Fire Department Dispatcher", is made by the Initial Observer upon immediate awareness of a spill, release, fire, or explosion regardless of how small or large. The initial Observer provides the Dispatcher with the information called for in Section II-B, "Duties and Responsibilities of the Initial Observer" and this section.

The Fire Department Dispatcher will immediately dispatch Fire Department personnel. Upon arriving at the scene, Fire Department Personnel assess the situation and make the decision to what extent emergency response should be implemented based upon the criteria provided in this section. If deemed necessary by responding Fire Department Personnel, an Incident Commander will be dispatched to the scene.

The Fire Department Incident Commander has the authority to commit the resources required to carry out emergency hazardous waste responses and implement the Contingency Plan. All personnel identified as participants in the implementation of the Contingency Plan and key management personnel have been provided with copies of the Contingency Plan as well as training in its implementation.

The Incident Commander may implement the Contingency Plan if the following conditions exist:

- Fire
- Explosion
- Imminent danger of a Fire or Explosion involving hazardous materials resulting in the igniting of hazardous wastes or release of toxic materials.
- A spill that could result in release of flammable liquids or vapors, thus causing a fire or explosion hazard.
- Spills that could cause the release of toxic liquids or fumes and harm employees.
- Spills involving wastes or other materials with a Health Hazard Degree of 3, regardless of size.

- A spill that can be contained on site, but the potential exists for ground water contamination.

- A spill that cannot be contained on site, resulting in off-site soil contamination or ground water or surface water pollution.

- A major spill or material release in excess of the reportable quantity listed in 40 CFR 302.4.

For purposes of complying with the notification requirements of Section 103(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the reportable quantities (RQ) contained in 40 CFR 302.4 will be utilized.

Other factors that are considered prior to the implementation of emergency procedures are:

- Past experience
- Specific process operation
- Location
- Inherent danger of release
- Ability to contain and mitigate
- Potential hazards to human health and the environment

Once the Incident Commander has determined that an emergency situation exists warranting implementation of the Contingency Plan, the Fire Department Dispatcher will become the communications center handling all request for assistance and notification. As necessary, and when appropriate, Pratt & Whitney's Mobile Incident Command Center (Rescue 14) will be brought to the scene. This center has full multi-line telephone communication capabilities and multi-channel two-way radio communication capabilities.

B. Initial Response

The following responses are required for any type of incident involving hazardous materials with a potential threat to persons or the environment, whether caused by fire, explosion, spills, or other releases. Immediate action by the first observer to minimize the potential for harmful effect must be followed by timely and proper notifications.

The initial response to any emergency shall protect human health. Consequently, the initial observer shall not take undue risks with his or her own personal safety in attempts to limit a

release to the environment. All personnel associated with the operation of the CWS&TF shall be particularly aware of the hazards posed by the release of hazardous wastes classified by NFPA as Health Hazard 3 materials.

The secondary response shall be to limit damage to the environment. This may include containment and spill countermeasure procedures.

A third priority is clean-up, treatment, and disposal of spilled material. These responses shall be made after the Incident Commander and Environmental Coordinator have identified and assessed the hazards.

1. Operational Procedures

Upon notification by an employee of an imminent or actual hazardous material related emergency situation, fire, or explosion the Pratt & Whitney Fire Department Dispatcher will immediately dispatch an Incident Commander to the scene. Upon arriving on the scene of the hazardous material spill, release, or related emergency, the Incident Commander will assess the situation, don appropriate PPE and will institute the appropriate containment and response procedures as defined elsewhere in this section.

The Incident Commander will, as necessary, call in additional Pratt & Whitney Fire Department personnel and Waste Treatment personnel to provide assistance and any additional staff resources from the departments and divisions identified in Section II-6.
The security staff will keep unnecessary and unauthorized personnel clear of the hazardous material spill, release, or emergency. Incident Commander will review the affected area's operations with the areas supervisor and shutdown or reduce the level of the operation if necessary. If necessary, the area will be evacuated. Facility operations not affected will continue as normal.

In the affected area, the security staff is responsible for checking the safety and accountability of all personnel. Any injured or missing employees shall be reported to the Medical Department and Incident Commander for appropriate action.

The Incident Commander or designee will be in charge of communications. Facility personnel and East Hartford Fire and Police Departments will be notified at the discretion of the Incident Commander or designee. Section II contains the names and telephone numbers of the internal and external contacts, that may be notified.

The Environmental Coordinator is responsible for notifying appropriate federal and state

agencies and remediation vendors if their help is needed. The Environmental Coordinator will direct all clean-up activities.

If the Incident Commander determines that there is a threat to human health or the environment, he will immediately notify the Pratt & Whitney fire Department Dispatcher to notify the Pratt & Whitney Security Force, the area supervisor and the Environmental Coordinator. The Security Force will evacuate the area. If the Incident Commander determines that there exists a threat to neighboring properties and the evacuation of the areas outside of the facility boundary may be required, he will relay this information to the Pratt & Whitney Fire Department Dispatcher. The Pratt & Whitney Fire Department Dispatcher will then notify the East Hartford fire Department Emergency Dispatcher and the East Hartford LEPC. Decisions to notify abutting properties will be made by the representative of the East Hartford Fire Department. Notification to regulatory agencies, where required will be made by the Environmental Coordinator as outlined in Section VI.

2. Identification of Hazardous Materials

The Incident Commander immediately identifies pertinent information about the hazardous material spill or release (i.e., character, source, amount, extent, etc.). This identification involves visual analysis and investigation of the location and nature of the spill.
The most likely types of hazardous spills that could occur at Pratt & Whitney, are solid hazardous waste spills, liquid hazardous waste spills, and raw materials or product spills. The Incident Commander has knowledge of the hazardous materials used at the various locations within the facility, and has access to the hazardous chemicals reference list, Pratt & Whitney marking and labeling identification system, and other resources which readily aid him in a quick and accurate identification of the waste involved and the associated hazards. Containers of hazardous waste classified as "**Health Hazard 3**" by NFPA 704 are identified by a NFPA hazard diamond with a "**3**" in the blue section. Cleanup or handling of these materials requires appropriate personal protective equipment, consisting of, at a minimum, respirator protection.

3. Hazard Assessment

Possible direct or indirect hazards to human health or the environment are assessed by the Incident Commander with assistance, as necessary, from the Environmental Coordinator, Environmental Department staff members, the Safety Officer, and IH&S staff members.
The Incident Commander assesses the situation for possible hazards to human health or the environment in a number of ways. He may evaluate the likelihood of a fire or explosion by checking possible sources nearby and operations in the area. He may identify the composition of a spill or accidental release of material by the nature and location of the release. He may

also rely on other methods that utilize available materials, consultation with the Environmental Protection Groups, common sense, his experience, and review of MSDS's for the specific chemicals. The Incident Commander's assessment criteria are based upon his training and experience, his knowledge of the operation and activities, the raw products, the wastes, the associated hazards, and the seriousness of the incident and consultation with the Environmental Coordinator and Industrial Hygiene and Safety staff.

Past experience and knowledge of the facility show that there is little or no potential for adverse impact on property outside this facility in the event of a hazardous material spill or release. This is because of the size of the facility and the controls on quantities of hazardous materials handled. The off-site adverse impact to adjacent properties in the event of a fire or explosion involving ignitable hazardous wastes, is also minimal. Again because of the size of the facility and the response capabilities of the P&W fire protection system and Fire Department.

Should the Incident Commander determine that a threat to human health or the environment does exist, he follows and institutes the notification procedures described in Section II and above.

C. Response Procedure for Fire and /or Explosion Involving Hazardous Material

If a fire or explosion involving hazardous material occurs, the procedures described below should be followed for rapid and safe response and control of the situation.
The initial observer of a fire or explosion contacts the Pratt & Whitney Fire Department Dispatcher, Extension **5-1111**, at the earliest possible moment and provides the Dispatcher with the following information:

- Name of person reporting and telephone.
- Where the incident is located.
- What the nature of the emergency is.
- What material is involved and UN. number (if known).
- How much material is involved (if known).
- What corrective action has been taken if any.
- Whether personnel injuries are involved.

- Whether a spill or release has occurred or is threatening to occur.

In addition if a fire or explosion has occurred, the following response actions are initiated:

- The fire alarm shall be sounded.
- The building shall be evacuated in accordance with the evacuation plan presented in Appendix B.
- If possible, without risk of personal injury, fire extinguishers shall be used to fight fires until the fire department arrives.

The Pratt & Whitney Fire Department Incident Commander then assesses the character, exact source, amount, and extent of hazard associated with the fire or explosion. The appropriate P&W internal departments, management, and authorities are notified as described in Section II. Outside emergency response agencies will be contacted as necessary and as appropriate by the Incident Commander as outlined in Section II.

The Incident Commander will choose the fire extinguishing equipment to be used in consultation with the Environmental Coordinator and Safety Officer. Fire fighting procedures will be directed at the scene by the Pratt & Whitney Fire Department under the direction of the Incident Commander.

The Incident Commander in consultation with the Environmental Coordinator and Safety Officer will determine the appropriate personal protection and safety equipment to be utilized. Containers of hazardous waste classified as "**Health Hazard 3**" by NFPA 704 are identified by a NFPA hazard diamond with a "**3**" in the blue section. Cleanup or handling of these materials requires appropriate personal protective equipment, consisting of, at a minimum, respirator protection. The selection of Emergency Response equipment is based upon the incident, past experience and knowledge of the specific operation.

Action to prevent the recurrence or spread of fires/explosions or releases shall include stopping processes and operations, collecting and containing released wastes, temporarily cleaning the area using sand or inert materials, covering all manholes and storm drains, and recovering or isolating containers.

Fire fighting equipment and vehicles can easily reach all buildings and hazardous waste storage

areas at the facility. Asphalt surfaced roads allow for easy access to all areas.

The Pratt & Whitney full time Fire Department will fight all fires and respond to all explosions with the full complement of fire fighting equipment needed. the East Hartford Fire Department may also respond to the incident. The ranking East Hartford fire Officer may assume direct command at any time. See Section VII for details on the arrangement between Pratt & Whitney and the East Hartford Fire Department.

Existing fire equipment, fire hoses and fire hydrants located throughout the site are maintained and inspected regularly. Many of the structures on-site, including the Centralized Waste Storage and Transfer Facility, have automatic sprinkler systems for immediate response to fire.

The Incident Commander has available to him explosive and oxygen meters, the Aims 300 gas analyzer, Draeger tubes, etc.

D. Response Procedures for Spill or Release of Hazardous Materials

In the event of a release of hazardous material to the environment, the following procedures should be implemented for rapid and safe response to contain, limit, and clean up the spill.

The Fire Department Dispatcher, Ext. 5-1111, shall be contacted to activate the Emergency Reporting Procedure as soon as possible. In addition, all actions taken to contain, limit, and clean up a spill shall be undertaken with care and good judgment to avoid risk or injury to personnel and minimize the impact on the environment.

The Initial Observer shall provide the Dispatcher with the information listed on page II-2 under "Duties of the Initial Observer".

The Incident Commander then assesses the character, exact source, amount, and extent of any released materials or chemical spill. The Incident Commander, in consultation with the Environmental Coordinator and Safety Officer, selects the appropriate personal protective safety gear and equipment. Containers of hazardous waste classified as "**Health Hazard 3**" by NFPA 704 are identified by a NFPA hazard diamond with a "**3**" in the blue section. Cleanup or handling of these materials requires appropriate personal protective equipment, consisting of, at a minimum, respirator protection.

The Incident Commander takes all reasonable measures to prevent a spill or other release of hazardous materials from spreading to other areas. A variety of containment measures, equipment, and staff resources are available at the facility. The ones chosen depend on the

nature of the release. Specific procedures for releases that would occur follow.

1. **Acids**

   a) Eliminate source of spill if possible, without risk.

   b) Dike spill area with sodium bicarbonate and cover all manholes and storm drains in the area.

   c) Remove incompatible materials.

   d) Remove objects in spill area that have not yet been contaminated.

   e) Soak up spilled material with sodium bicarbonate and remove for treatment or storage.

   f) After all sodium bicarbonate has been removed, rinse spill area with water, collecting rinse water for disposal.

2. **Alkalis**

   a) Solid Material (Including Industrial Wastewater Treatment Plant Sludge)

      1) Eliminate source of spill if possible, without risk.

      2) Pick up spilled material and remove for treatment.

      3) Rinse spill are and any contacted objects with water, collecting rinse water for disposal.

   b) Liquid Material

      1) Eliminate source of spill if possible, without risk.

      2) Dike spill area with sodium bicarbonate and cover all manholes and storm drains in the area.

      3) Remove incompatible materials.

      4) Remove objects which have not been contacted.

5) Soak up spill with sodium bicarbonate and remove for treatment or storage.

6) After removing sodium bicarbonate, rinse spill area with water collecting rinse water for disposal.

3) **Cyanides**

CAUTION: Contact with acids will cause cyanide salts or their solutions to generate hydrogen cyanide gas which is extremely toxic and flammable.

Hydrogen cyanide gas can cause instantaneous loss of consciousness and death.

a) Eliminate source of spill if possible, without risk.

b) Dike spill area with sodium bicarbonate and cover manholes and storm drains in the area.

c) Remove incompatible materials.

d) Remove objects in spill area that have not yet been contacted.

e) Soak up spilled material with sodium bicarbonate and remove for treatment. If cyanide solution is recovered it will be placed in cyanide storage tank. Be sure all contacted material is removed for treatment.

4) Wax/Solvent, Oil/Solvent, Solvents, Paints

a) Eliminate source of spill if possible, without risk.

b) Remove sources of ignition.

c) Dike spill area with sawdust and dike or cover all manholes and storm drains in the area.

d) Remove incompatible materials.

e) Remove objects in spill area that have not been contacted.

f) Soak up spilled material with sawdust. Remove for off-site disposal.

5) **Material Containing PCBs**

In the event of a spill containing PCB contaminated fluid, the East Hartford Environmental, Health, and Safety Procedure MATW-7.4 shall be followed. This procedure meets all present notification, cleanup, and documentation requirements for the cleanup of PCB spills regulated under TSCA.

a) Always wear full protective clothing. This includes:

1) Disposable splash coveralls
2) Disposable vinyl gloves together with disposable cotton gloves
3) Disposable rubber boots
4) Disposable apron
5) Face shield

b) Avoid breathing vapors.

c) Eliminate source of spill if possible, without risk.

d) Dike spill area with sawdust.

e) Remove objects in spill area that have not yet been contaminated.

f) Soak up spill material with sawdust and place in appropriate container for incineration.

g) Remove any contaminated base material (soil, asphalt) and place in appropriate container.

1) Liquid - approved steel drum
2) Solid, Burnables and Non-Burnables - approved steel drum (DOT 17C)

h) Decontaminate equipment used to clean up the spill by triple rinsing with appropriate solvent, and placing rinseate in approved barrel.

i) Place used disposable protective clothing in appropriate container.

6.) **Container Spills and Leaks**

Hazardous waste containers are stored in the Centralized Waste Storage and Transfer Facility (CWS&TF) and in other less than 90 storage areas identified in Section I. The

area designated, CWTP-3, consists of three underground storage tanks. No containers are stored in this location. Containers are stored at the Colt Street less than 90 day storage area.

All hazardous waste containers in these areas are inspected for corrosion, structural defects, and leakage. If a container holding hazardous waste is not in good condition or if it shows signs of beginning to leak, steps will be taken to orient the container so as to minimize the potential for leakage, after which the hazardous waste will either be transferred to a container in good condition, or the container will be over packed.

If the leaking container is a drum, (all drums containing hazardous waste are stored in the CWS&TF and are palletized) a fork lift truck will remove any drums preventing access to the leaking drum. The leaking drum will then be transferred by fork lift to the staging area to allow for the safe transfer of the contents of the leaking drum to another drum or to allow the drum to be over packed. Containers of hazardous waste classified as "**Health Hazard 3**" are identified by NFPA hazard diamond with a "3" in the blue section. Cleanup or handling of these materials require appropriate personal protective equipment, consisting of, at a minimum, respirator protection.

At a minimum, Level D personal protective equipment will be used for these procedures.

7) **Cleanup**

Following the above described containment and countermeasures should ensure a quick cleanup that minimizes the impact upon human health and the environment. After responding to the emergency and prior to resuming operations in the affected area, the following cleanup inspection procedures should be implemented:

- remove all wastes, equipment and cleanup containers from the area
- inspect the area for the presence of visible residue
- remove any remaining residue with absorbents if necessary
- wash the area with a suitable cleaner

Types of Hazardous Waste	Preferred Cleaning Solution
Inorganic acids, metal processing wastes	Sodium Bicarbonate solution

Oily, greasy, unspecified waste	Solution capable of dissolving organics
Inorganic bases, alkali, and caustic waste	Dilute acid solution
Pesticides, fungicides, chlorinated phenols	Hypo chlorite solution
Cyanides, and other non-acidic inorganic wastes	Hypo chlorite solution
Solvents and organic compounds	Solution capable of dissolving organics and a sodium bicarbonate solution
Heavy metals	Sodium bicarbonate solution

- place all cleanup debris in an appropriate waste container and separate containers if appropriate.
- evaluate and characterize the cleaned up debris and waste based on the raw products used and/or wastes generated at the location
- store and dispose of contaminated debris and waste according to the type of wastes
- inspect the area

E) Evacuation Plan

In the event of a sudden and uncontrollable occurrence such as fire, explosion, or major uncontrollable chemical spill which poses a threat to the safety of personnel, the area of the occurrence shall be evacuated immediately in an orderly and efficient manner. An evacuation plan for the waste treatment and storage areas at the East Hartford manufacturing facility is presented in Appendix B. This plan describes how evacuation will be initiated, how employees may exit from plant buildings, and where employees should assemble following evacuation.

F. Post-Emergency Actions

Immediately after an emergency, the Environmental Coordinator shall make arrangements for treatment, storage, or disposal of recovered hazardous waste or any other contaminated material.

For hazardous waste incidents, the Environmental Coordinator must ensure that in the affected areas of the facility:

1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed.

2) All emergency equipment is cleaned and fit for its intended use before operations are resumed.

The EPA Regional Administrator, the Commissioner of the CT DEP, and appropriate local authorities must be notified that the facility is in compliance with the above before operations are resumed. Details of the incident must be recorded in the facility operating record.

Following emergencies, the Incident Commander completes a written incident report. The Incident Commander will conduct a post-incident debriefing of involved supervisors and all response personnel including community responders. A formal incident critique and written report including recommended changes to the contingency plan will follow.

G. Post-Emergency Equipment Maintenance

After an emergency, all emergency equipment utilized and potentially exposed to contamination (listed in Appendix C) is cleaned, decontaminated, and deemed ready for its intended use. Depleted stocks of neutralizing/absorbing materials are replenished and protective clothing cleaned or replaced. Any wastes generated as a result of decontamination of emergency equipment will be managed as described herein and in accordance with the Waste Analysis Plan for the East Hartford facility.

V. EMERGENCY EQUIPMENT

A. General

Emergency equipment and resources for response to fires, explosions or any release of hazardous waste which could threaten human health or the environment is provided at strategic location at the East Hartford plant. Generally, this equipment may be divided into the following categories:

- Security systems and communications
- Fire fighting resources
- Personal protection equipment
- Spill control equipment

Descriptions of emergency equipment and resources are presented in the following paragraphs as well as a brief discussion of equipment testing and maintenance procedures. The plant emergency equipment inventory is in Appendix C and emergency equipment locations are included in Appendix D.

B. Security System and Communications

The Pratt & Whitney facility in East Hartford supports a full time security force. Security at the plant is maintained on a 24 hour per day, seven day per week basis by the company's own plant protection department. The property and the company's facilities are completely enclosed with six-foot high, steel mesh fence, and all entrance gates are either locked or manned by a plant security guard. During off shifts and weekends when the plant is not operating, the gates are locked and the security guard has a watchman clock that must be punched hourly.

Communication at the plant during emergencies may be established by telephone, the public address system, or two-way radios. The public address system provides coverage to the entire facility. Telephones are located throughout the facility as well. Many Fire Department personnel and Waste Treatment personnel are provided with two-way radios. Locations of communication equipment in the CWS&TF units and the less than 90 day storage areas are presented in Appendix D. Environmental Coordinators are provided with pagers.

C. Fire Fighting Resources

The Pratt & Whitney facility in East Hartford supports a full-time fire department. The fire department coverage is on a 24 hr. per day, 7 day per week basis. In addition, Pratt & Whitney maintains numerous specialized fire and security vehicles for use inside and outside the facility.

Fire fighting equipment located throughout the facility includes sprinklers, fire hydrants, hose houses, and fire extinguishers. The locations and types of fire fighting equipment at the plant are listed in Appendix C and maps showing their locations are presented in Appendix D and on Figure D-1. The P&W Fire Department personnel are intimately familiar with all equipment and locations.

D. Personal Protection Equipment Resources

Personal protection available to prevent hazardous exposures includes the following :

- Full protective clothing including face shields, boots, aprons, gloves, and chemical protective suits up to Level A
- Respirators
- Scott air packs
- Emergency showers
- eye wash stations

Locations and descriptions of personal protection equipment at the East Hartford plant are listed in Appendix C and maps identifying these locations shown on Figure D-1.

E. Spill Control Equipment

Emergency response and spill control equipment at the East Hartford plant may include the following:

- Shovels and rakes
- Brooms
- Barrels
- Hoses
- Wet vacuums
- Portable transport tanks
- emergency pumps
- Sawdust
- Inert adsorbent
- Sodium bicarbonate
- CWTP Spill Response Vehicle

A listing of the locations of this equipment at the plant is presented in Appendix C and maps identifying these locations are shown in Appendix D and on Figure D-1.

In addition, Pratt & Whitney has a mobile van outfitted with hazardous materials response equipment. A listing of the van's equipment is presented in Appendix C. This van is located at Fire Headquarters.

F. Emergency Equipment Testing Maintenance

Fire/safety equipment is routinely inspected and maintained by the Pratt & Whitney Fire Department according to the National Fire Protection Codes. Equipment includes fire extinguishers and Scott Air Packs which are recharged immediately after use. Records of compliance with the codes are kept. by the Fire Department.

As a matter of practice, the other emergency equipment is always replaced after it is used. Materials that are used in emergencies are available at nearby Engineering cribs.

VI. INCIDENT REPORTING REQUIREMENTS

This section contains a summary of the verbal and written notifications which must be made to federal, state, and local agencies in the event of a release. It is divided into the following sections:

A. Any release/Incident
B. Releases reportable under CERCLA
C. Releases reportable under SARA Title III
D Releases that require implementation of the Contingency Plan

Part 1 of each section contains verbal notification requirements and part 2 of each section contains written notification requirements.

It should be noted that Section A must be followed any time there is a spill or release, while Sections B, C and D must be reviewed independently for applicability by the Environmental Coordinator. If applicable, the requirements of Section B, C and D must be completed in addition to the requirements of Section A.

For further information or clarification of the reporting requirements, see the regulation referenced at the end of each section.

A. Any Release/Incident

1. Verbal Notifications

Any incident involving the discharge, spillage, uncontrolled loss or seepage of any chemical product (solid, liquid or gas) or hazardous waste must be reported immediately to:

The Department of Environmental Protection at 203-566-3338

2. Written Notifications

As soon as practical after an incident, but no later than the end of the next full work day, a written report documenting the nature of the incident shall be completed by the Environmental Protection Group and forwarded to:

The Department of Environmental Protection
Waste Management Bureau
Oil and Chemical Spill Section
79 Elm Street
Hartford, CT 06102-5066

The form used to make this report is included as Appendix A.

REFERENCE: CT General Statutes 22a-450

B. Releases Reportable under CERCLA

1. Verbal Notification

In addition to the notifications made for any release or spill as described above, a release or spill or of a hazardous substance which exceeds the reportable quantity (RQ) for that hazardous substance, must be reported immediately to the National Response Center at 800-424-8802.

Provide the National Response Center with the following information:

- The name and telephone number of the reporter
- The name and address of the facility
- The time of the incident
- The nature of the incident
- The name and quantity of the materials involved, to the extent known
- The extent of injuries, if any
- The possible hazards to human health or the environment outside the facility
- Containment and remediation efforts

The RQ for most hazardous substances is included in the table in 40 CFR 302.4. The RQs for hazardous substances not listed in 40 CFR 302.4 can be found in the "List of Lists" included in the BNACommunity Planning/Right to Know Guide locate in the Environmental Compliance Department office. RCRA Hazardous wastes not on the CERCLA list which exhibit the characteristic of ignitability, reactivity, or corrosivity have an RQ of 100 pounds. RCRA hazardous wastes not specifically listed, which exhibit the characteristic of toxicity have the RQ's listed on the CERCLA table for the contaminant on which the characteristic of toxicity is based. For wastes exhibiting the characteristic of toxicity, the RQ applies to the waste itself, not merely to the toxic contaminant. (If more than one RQ applies, always use the lowest.) All other non-listed hazardous substances have an RQ of 1 pound. Under RCRA, (40 CFR 264 and 265.193) any release from a hazardous waste storage tank or tank system has

an RQ of 1 pound.

Any release or spill of a hazardous substance, at CWS&TF, in excess of the RQ, ragardless of wether the release is "into the environment", must be reported to the East Hartford LEPC at 203-291-7100 or or 9-911, and the East Hartford Fire Department.

2. Written Notifications

There is no requirement for a written report following a CERCLA reportable release, however, the response to a CERCLA reportable release may be considered an implementation of the Contingency Plan. (See Section D)

REFERENCES: Federal Hazardous Waste Regulations - 40 CFR 302
40 CFR 264 and 265.193
Connecticut Hazardous Waste Regulations - 22a449(c)-100-110

C. Releases Reportable under SARA Title III (EPCRA)

1. Verbal Notifications

In addition to the notification requirements described in items A an B of this section, any release to the environment, of a substance that is a CERCLA hazardous substance or extremely hazardous substance (EHS), that exceeds the reportable quantity (RQ) as listed in 40 CFR 302.4 or 355 Appendix A, must be reported immediately to:

State Emergency Response Commission at 203-566-4633
East Hartford Local Emergency Planning Committee at
203-291-7100 or 9-911

The following information must be provided:

- Name and phone number of the person making this notification
- The chemical name or identity of the substance involved in the release
- An indication that the substance is an extremely hazardous substance
- An estimate of quantity released to the environment
- The time and duration of the release
- The environmental media into which the release occurred (air, surface or ground water or soil)
- Any known or anticipated health risks associated with the released substance

Lists of CERCLA RQ's and EHS's are available in the Environmental Protection Group office in the BNA Community Right to Know Planning Guide. Any EHS not on the CERCLA list has an RQ of 1 pound under SARA Title III (EPCRA).

2. Written Notifications

As soon as practicable after a release reportable under SARA Title III (EPCRA), a written follow-up notice must be sent to the State Emergency Response Commission and the Local Emergency Planning Committee. The written notice must contain:

- The information provided during the verbal notification
- Precautions taken as a result of the release including evacuation
- Where appropriate, advice regarding medical attention necessary for exposed individuals

A release reportable under EPCRA may be considered an implementation of the Contingency Plan. (See section D)

REFERENCES: CERCLA - 40 CFR Part 302
Emergency Planning and Notification - 40 CFR Part 355.40

D. Releases Requiring the Implementation of the Contingency Plan (RCRA)

This Contingency Plan will be implemented if there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, in any amount, which could threaten human health or the environment. The Contingency Plan may be implemented for CERCLA or SARA Title III reportable releases also, at the discretion of the Incident Commander.

1) Verbal Notification

In addition to the requirements of item A of this section and the requirements of items B and C if applicable, any release of hazardous waste or waste constituents in excess of the RQ, within the CWS&TF, must be reported immediately to:

East Hartford Local Emergency Planning Committee at
203-291-7100 or 9-911

2. Written Notifications

Within 15 days after the incident requiring implementation of the Contingency Plan, a written

report on the incident must be submitted to the EPA Regional Administrator and the Commissioner of the DEP. The report must include:

- Name, address, and telephone number of the owner or operator
- Name, address, and telephone number of the facility
- Date, time, and type of incident
- The name and quantity of the materials involved
- The extent of injuries, if any
- An assessment of actual or potential hazards to human health or the environment
- Estimated quantity and disposition of recovered material that resulted from the incident

REFERENCES: Federal Hazardous Waste Regulations - 40 CFR 264.56 and 265.56
Connecticut Hazardous Waste Regulations - 22a449(c)-100-110

VII. Arrangements with Local Authorities

A. General

Pratt & Whitney has emergency service arrangements with the local fire department, police department, area ambulance services, area hospitals, and emergency response contractors. Requests for assistance from outside agencies are coordinated through the Pratt & Whitney Fire Department dispatcher. All requests for assistance from the East Hartford Fire Department, paramedics, and police are made by calling the East Hartford Central Dispatch. The Pratt & Whitney dispatcher is in direct radio contact with the East Hartford Central Dispatch which can also be reached by calling 911. The conditions in which the East Hartford Central Dispatch is called are defined by an emergency notification matrix.

SPECIFIC ARRANGEMENTS WITH LOCAL AGENCIES

B. Fire Department

The East Hartford Fire Department is notified of emergency incidents through the East Hartford Central Dispatch by the Pratt & Whitney Dispatcher. Both the East Hartford and Pratt & Whitney Fire Departments operate under the Incident Command System. Statutory requirements mandate that the ranking fire official of the municipality having jurisdiction must maintain primacy and responsibility for emergency response. However, a historic relationship between East Hartford and Pratt & Whitney has enabled the two to coordinate response under a unified command. Pratt & Whitney recognizes East Hartford's authority to assume command at any time.

Because of Pratt & Whitney's proven response capabilities, the East Hartford Fire Department is not called to respond to every incident. They will respond if the incident has the potential to endanger life or property of East Hartford residents or Pratt & Whitney employees. However, under Pratt & Whitney's arrangement with the East Hartford Fire Department, they will always respond to a direct request for assistance from Pratt & Whitney. If assistance is required from other municipal fire departments, their response will be coordinated through East Hartford's Dispatcher, and they will report to the ranking East Hartford Fire Officer.

C. Emergency Medical Services

Pratt & Whitney's emergency service arrangement with the East Hartford Fire Department includes paramedic services as well. Under this arrangement, East Hartford Paramedics will be notified of medical emergencies through the centralized dispatcher and will respond when necessary or when requested by Pratt & Whitney Fire Department. Other ambulance services will be called by the East Hartford Fire Department when required. Pratt & Whitney may also contact private ambulance services with which we have agreements directly. East Hartford paramedics operate under license by the medical director of St. Francis Hospital with which Pratt & Whitney also has an agreement.

D. Police

Under Pratt & Whitney's arrangement with the East Hartford Police Department, the Police Department response is coordinated through the East Hartford Central Dispatch. Police responding to emergencies at Pratt & Whitney fall under the incident command system. The incident commander will always be a fire official. The East Hartford police recognize the authority of the incident commander.

E. Hospitals

Pratt & Whitney has arrangements with local hospitals in which area hospitals have been made aware of the properties of hazardous waste handled at Pratt & Whitney and the types of injuries and illnesses which could result from fires, explosions, or releases as described in the contingency plan. They keep a copy of our contingency plan on file and have agreed to provide emergency medical care to Pratt & Whitney employees.

F. Emergency Spill Contractors

Pratt & Whitney's arrangement with emergency spill contractors is by contractual agreement. Pratt & Whitney maintains 24-hour on-call task contracts with specific spill response contractors. Requests for assistance are made at the Incident Commander's or Emergency Coordinator's discretion.

EVACUATION PLAN

In the event of a sudden and uncontrollable occurrence such as a fire, explosion, or major chemical spill that poses a threat to the safety of personnel, the area of the occurrence should be evacuated immediately in an orderly and efficient manner. Employees should utilize any of several exits (described below) available at the treatment and storage areas.

The facility has a public address system throughout the manufacturing facility. There are also telephones located throughout the facility which can access the PA system. The Incident Commander may order the evacuation of any areas he deems at risk. Where a PA system is not available the Fire Department will use bullhorns to announce evacuation instructions. There is a PA system in the Concentrated Waste Treatment Plant and the Centralized Waste Storage & Transfer Facility (CWS&TF).

Once evacuation has been called, employees should proceed to the nearest building exit, leave the area, and assemble at the south side of the Maintenance Building immediately for check-in. The assembly area for Colt Street Treatment Plant is the entrance gate at Colt Street.

A complete description of evacuation routes is described below as possible evacuation routes are provided on Figures B-1 Through B-5.

a) Concentrated Waste Treatment Plant - Main Building (CWTP-1)

1) Pedestrian Door Exits:
   - A) South side, ground level (level between basement and first floor). Exit under treatment platform to outside door on east side.
   - B) East side, first floor exits to treatment plant yard.
   - C) South side, treatment platform level (level between first and second floor). Exit across treatment platform and down stairs to south side outside door or to stairway to first floor and to outside door on east side to treatment plant yard.

2) Other Exits:
   - A) From Laboratory area out west side pedestrian door to CWTP-3 area, or to east to first floor edit to treatment plant yard
   - B) East side, first floor, loading dock area - overhead exit door to treatment plant yard.

b) Concentrated Waste Treatment Plant - Former Waste Storage Building (CWTP-2)

1) Pedestrian door exits:
   A) North side, first floor exit to treatment plant yard.
   B) West side, first floor exit to treatment plant yard.

2) Other exits:
   A) West side, first floor loading dock overhead door exits to treatment plant yard.

c) Concentrated Waste Treatment Plant-Storage Building A (CWTP-5)

1) Pedestrian door exits:
   A) West side of building, exit to treatment plant yard.
   B) South side of building

2) Overhead door exits:
   A) Four on west side of building, exit to treatment plant yard.

d) Concentrated Waste Treatment Plant-Storage Building B (CWTP-6)

1) Pedestrian door exits:
   A) North side of building, exit to treatment plant yard.

2) Overhead door exits:
   A) Three on north side of building, exit to treatment plant yard.

e) Centralized Waste Storage and Transfer Facility (CWS&TF)

1) Pedestrian door exits:
   A) All four sides, exit to yard and Willow Street

2) Overhead door exits:
   A) Four on South side of building, exit to Willow Street
   B) One on North side of building, exit to yard

f) Concentrated Waste Treatment Plant - Yard Area

1) Fence exits are located on the east, west, and south side or the yard, exit to maintenance building area, Willow Brook Road, and Willow Street, respectively.

g) Pre-Treatment Plant

1) Pedestrian door exits:
   A) South side
   B) East side

2) Other exits:
   A) East side, overhead doors.

h) Colt Street Treatment Plant

1) Pedestrian door exits:
   A) South side of control building, upper level, exit via road to gate at Colt Street.
   B) South side of control building, truck loading area, lower level, exit via road to gate at Colt Street.
   C) North side of control building, upper level, exit onto rapid mix tank walkway and use stairs at southwest corner, to sidewalk and road to gate at Colt Street (Note: Use this route to exit from lower level pump room.)
   D) West side of control building from oil pump room, lower level, exit via road to gate at Colt Street.
   E) South side of thickener gallery, exit via stairs up, to road to gate at Colt Street.

2) Overhead door exits:
   A) Three doors on west side of control building, <90 day storage area, lower level, exit via road to gate at Colt Street.
   B) One door on south of control building, loading dock, upper level, exit via road to gate at Colt Street (Note: This exit has a four foot drop to gate and is to be used only if the pedestrian door is not usable.

3) Tanks and Grounds
   A) Rapid mix tank and oil separator walkways, use stairs at southwest corner, exit via road to gate at Colt Street.
   B) Thickener tank walkways, use stairs on south side, exit via road to gate at Colt Street.
   C) Clarifiers and neutralization tank walkways, use stairs on west side and road to gate at Colt Street.
   D) Other points on this site, use most direct safe route to gate at Colt Street.

i) Experimental Test Area Oil House

1) Pedestrian door exits: East side

2) Sliding door exits: one on east side and three on west side.

3) Safe area: Exit to X-117 test stand (see Figure B-4) and call fire department.

j) Main Oil House

1) Pedestrian door exits

A) East side

B) South side

c) Two on west side

2) Safe area: Exit to Guard Post 26 (see Figure B-5) and call fire department.

l) Roll-Off Storage Area south of Maintenance Building

This is an outside storage area. Exits and evacuation routes are not applicable.

STATEMENT OF ENVIRONMENTAL POLICY AND CONTINGENCY PLAN

UNITED TECHNOLOGIES CORP.
PRATT & WHITNEY
400 MAIN STREET
EAST HARTFORD, CT 06108

Issue Date: 11/1/92
Current Revision: 1/20/95

I. INTRODUCTION

A. GENERAL

This Integrated Incident Response Plan has been prepared for the Pratt & Whitney (P&W) East Hartford facility at 400 Main Street, East Hartford, Hartford County, Connecticut, 06108. This facility occupies approximately 1096.6 acres of land and employs approximately 7,000 people. The facility switch-board telephone number is 203-565-4321. Principal activities are the design, development, testing and manufacturing of aircraft engines.

The facility consists of a main factory complex, a separate power house, several separate office building, several auxiliary buildings, engine development and testing facilities, Centralized Waste Storage and Transfer Facility, a Concentrated Waste Treatment Plant and a Dilute Industrial Wastewater Treatment Facility.

B. SITE CONSIDERATIONS

The P&W East Hartford facility is located east of the Connecticut River, south of Willow Brook, and north of Brewer Street in the Town of East Hartford, Connecticut. A topographical map of the facility is presented as Figure II-A-1.

Through the north end of the complex runs Willow Brook in an east to west direction to the Connecticut River. There is a dam and pond in the vicinity of the Concentrated Waste Treatment Plant (CWTP). The 100 year flood level is 33.3 feet and is located within the pond embankments. The 500 year flood level is 36.1 feet which would also be contained. The source of this flood level data is the August 1979, Flood Insurance Study by the US Department of Housing and Urban Development, Federal Insurance Administration.

C. TRAFFIC PATTERNS

The major highways nearest to the East Hartford manufacturing facility are routes 2 and I-84. Trucks traveling Route 2 use the Willow Street Exit and enter the facility through the Willow Street gate. These trucks then proceed on Willow Brook Road to the Centralized Waste Storage & Transfer Facility (CWS&TF). Trucks exiting from I-84 proceed through the Silver Lane entrance gate onto West Connector Road, to Willow Brook Road and then to the CWS&TF. The maximum weight of fully loaded vehicles carrying hazardous or non

hazardous waste entering or leaving the site is 80,000 lbs. Approximately 600 tankers and 250 trailers containing hazardous and non hazardous waste enter the Facility per year. The load bearing capacity of the interplant roads are 14,000 pounds per square foot and the road surfacing is bituminous asphalt.

D. WASTE GENERATION

This complex, in designing, developing, machining, manufacturing and testing aircraft engines, generates large quantities of waste through batch discharge and/or continuous discharge. These wastes include industrial wastewater, dilute oily wastes, characteristic hazardous waste (Ignitable, Corrosive, Reactive, and Toxic) and spent solvents.
Pratt & Whitney also utilizes a wide variety of products that are listed hazardous wastes (acids, alkalis, cyanides, alcohols, metal plating solutions, specialty solutions, fungicides, epoxy, cleaners, resins, paints, and solvents, and many commerical chemical products listed in 40 CFR 261.33 (e) and (f).

Specific processes which use the above products and which result in the generation of hazardous wastes include the following:

- Product Rinsing
- Stripping
- Electroplating
- Cleaning, Degreasing
- Etching
- Sludge Removal
- Solvent Reclamation
- Spill Cleanup
- Battery Replacement
- Process Equipment Decontamination
- Cleaning Fuel Systems
- Routine Cleanup
- RCRA Closure
- Plating
- Abrasive Jet Machining
- Anodizing
- Chemical Machining (Chemical Milling)
- Electrochemical Machining
- Electrical Discharge Machining
- Vapor Degreasing
- Alkali Cleaning
- Heat Treating
- Acid Cleaning
- Electroless Plating
- Product Filtering
- Painting
- Photo Developing
- Disposal of Obsolete Materials
- X-Ray
- Machine Oil Changes
- Salt Bath Descaling
- Acid Treatment (Pickling)
- Chromate Conversion
- Machining

E. WASTEWATER COLLECTION / TREATMENT

Within the factory complex, several dilute industrial wastewater and dilute oily waste collection and pumping systems have been installed to provide proper containment, storage, and transfer of the various waste waters to the Pratt & Whitney concentrated waste pre-treatment facility and industrial wastewater treatment facilities. The concentrated wastewater treatment facilities are located on the grounds of the main complex adjacent to Willow Street. The industrial wastewater treatment facilities are located at the company's Colt Street property. At these facilities, the waste waters are properly treated prior to discharging into the Connecticut River. This discharge is permitted under the state and federal National Pollutant Elimination System (NPDES) permit program.

Pratt & Whitney's Concentrated Waste Treatment Plant also handles concentrated wastewater, characteristic hazardous wastes, solvents, reclaimed and waste oils, and solvent/oil mixtures for processing and disposal. Waste oils are characterized then segregated for reclaim or disposal. These oils are transferred from 55 gallon drums into one of three waste oil tanks at the Concentrated Waste Treatment Plant (CWTP). Licensed vendors then pick-up bulk loads for reclaim or disposal at permitted TSDF's. Waste soluble oil obtained within the manufacturing complex is collected in 500 gallon portable tanks and transported to a "Jeffrey" sludge separator from which the liquid fraction is pumped to the CWTP for further treatment and disposal.

F. STORAGE LOCATIONS

Hazardous wastes are stored at the facility in the Centralized Waste Storage & Transfer Facility (CWS&TF), as well as in nine less than 90 day storage areas. The less than 90 day storage areas and the types of wastes stored in each are listed below. The locations of these areas are identified on the maps presented as figure 2 and 3.

Location No.	Description
1	(CWTP-3) - Three 10,000 gallon underground storage tanks
2	Experimental Test Areas Oil House
3	Main Oil House
4	CWTP-5
5	CWTP-6
6	Roll-off Storage Area South of the Maintenance Building
7	Colt Street Metal Hydroxide Storage Area

The types of waste streams handled at each location are as follows:

Location No.	Description
1	Hazardous and non-hazardous waste oils, On-spec used oil
2	Waste oils, oily contaminated debris
3	Waste oils and solvents, oils for reclaim
4	Waste oils and solvents, bulk solids from remediation
5	Lab pack materials, non-hazardous wastes
5	Equipment decontamination solutions in tanks
6	Bulk remediation debris (solids) in rolloffs - hazardous and non-hazardous
7	Metal hydroxide sludge generated from wastewater treatment operations

G. STORMWATER DRAINAGE

Most storm water which falls onto the site is collected and discharged into a series of catch basins and storm sewers which flow into either Willow Brook to the north or Pewter Pot Brook to the south. Both of these brooks empty into the Connecticut River which is located about one half mile west of the main factory complex. All discharges emanating from the factory complex containing treated wastewater, industrial cooling water, or similar discharges are monitored under the NPDES permit program.

H. PLAN / POLICY

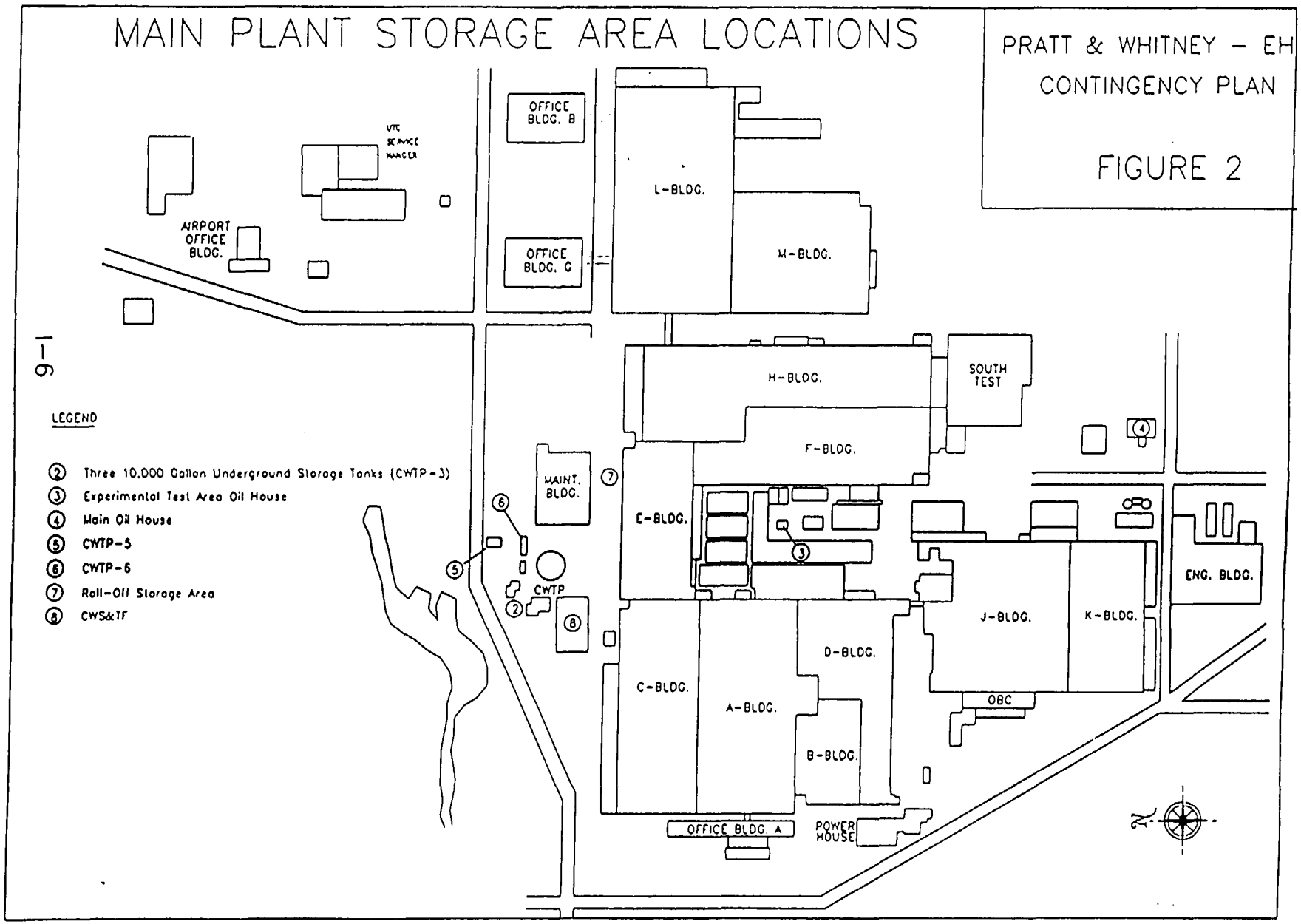
This document is designed to protect personnel, property, and the environment from hazards associated with accidental discharges and emergency incidents at the Pratt & Whitney (P&W) East Hartford Facility. This document establishes policy and creates procedures to be taken to prevent and contain spills and countermeasures to minimize any adverse impact to the environment, and reduce safety and health hazards from fires, explosions, or any release of hazardous waste or hazardous waste constituents. This is also a plan setting standards for the acceptable management of hazards encountered in emergency incidents.

This plan has been written to efficiently maximize the utilization of Pratt & Whitney's staff experience and management practices. The procedures outlined in this plan are to be carried out immediately whenever there is a fire, explosion, chemical spill, or release of hazardous waste constituents which could threaten human health or the environment.

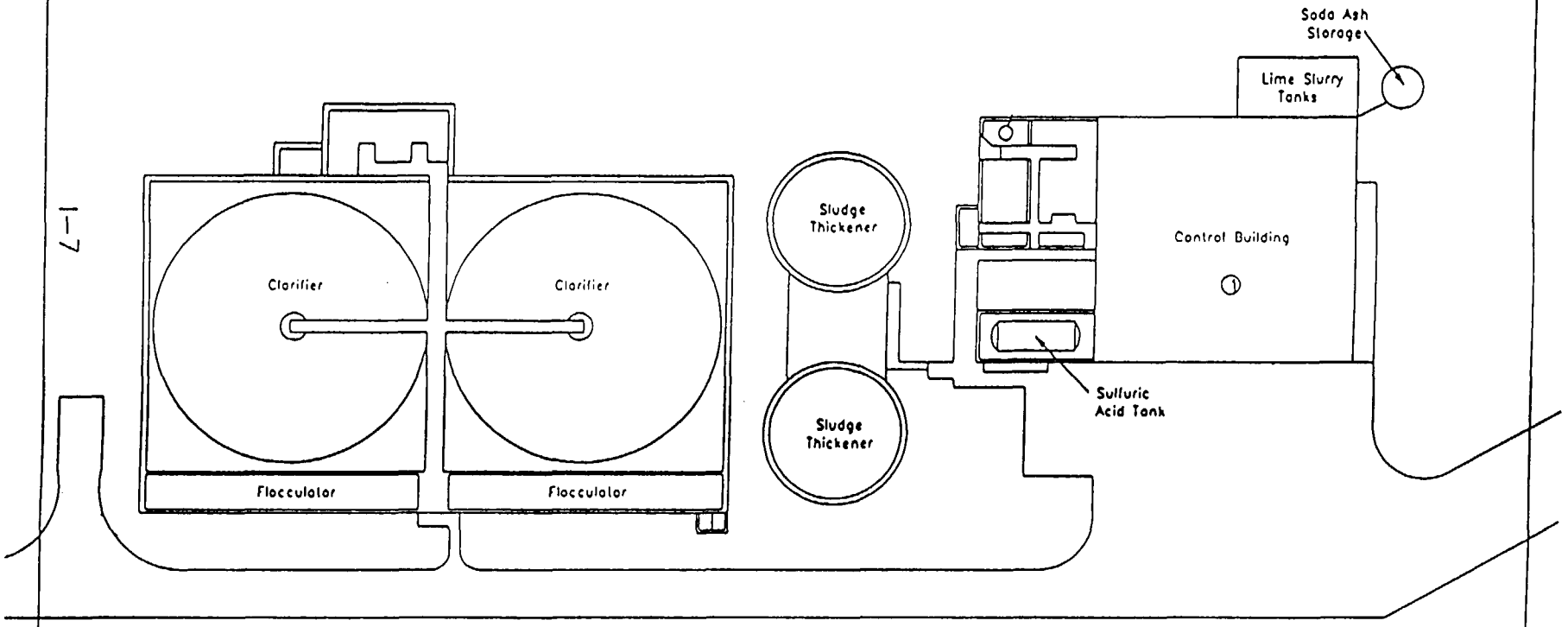
MAIN PLANT STORAGE AREA LOCATIONS

PRATT & WHITNEY – EH
CONTINGENCY PLAN

FIGURE 2



COLT STREET TREATMENT PLANT
STORAGE AREA LOCATIONS



LEGEND

① Metal Hydroxide Storage Area

PRATT & WHITNEY – EH
CONTINGENCY PLAN

FIGURE 3

II. INCIDENT COMMAND SYSTEM

A. GENERAL

Emergency response at Pratt & Whitney's East Hartford Facility is coordinated under an Incident Command System. The Incident Command System establishes the responsibilities of the various response personnel, the chain of command, and lines of communication. Under this system the responsibilities of the Emergency Coordinator as defined in 40 CFR 265.55 are borne by the Incident Commander. The term Incident Commander will be used throughout this plan and is understood to be synonymous with Emergency Coordinator. The Incident Commander is a member of the Pratt & Whitney full time fire department and is responsible for implementing the Contingency Plan and coordinating all emergency response activities. The Incident Commander may delegate responsibility to the Environmental Coordinator and other response personnel who reports to him. The Environmental Coordinator is a member of the environmental staff and advises the Incident Commander on technical issues.

The on-call Environmental Engineer, hereafter referred to as the Environmental Coordinator, and the Fire Department Incident Commanders are thoroughly familiar with all aspects of the Contingency Plan, the facility's operation and activities, the location and characteristics of waste handled, and facility records and layout. The Environmental Coordinators and the Fire Department Incident Commanders all have the authority to commit the necessary staff and emergency response equipment as required to implement this Contingency Plan. An Environmental Coordinator can be contacted day and night by pager as described herein. An Incident Commander is contacted by calling the Fire Dispatcher at 5-1111, 24 hrs/day.

Pratt & Whitney's East Hartford Facility personnel have been trained in the proper handling of hazardous waste and spill prevention and response. If an emergency situation develops at the facility, the initial observer shall notify the Fire Dispatcher immediately and follow the procedures outlined in Section IV "Emergency Response Procedures" and in Section II-C "Notification Procedures." In most instances the first responder will be a member of the Pratt & Whitney East Hartford fire department who may or may not be an Incident Commander. When appropriate, an Incident Commander and Environmental Coordinator will be dispatched to the scene. The Fire Department Incident Commander may be assisted in emergency situations by the Environmental Coordinator, the Environmental Protection Group, the Security Force, the Medical Department, the Industrial Hygiene and Safety Group, and other staff as necessary and further described in this document.

The Environmental Coordinator advises the Incident Commander about chemical hazards and means of mitigation. The Incident Commander may also designate appropriately trained persons to serve as Safety Officer, Security Officer, and Emergency Medical Coordinator. The Safety Officer will advise the Incident Commander on measures necessary to protect Pratt & Whitney emergency responders from hazardous exposures. The Incident Security Officer will assist the Incident Commander in maintaining order in the emergency area. The emergency Medical Coordinator will ensure appropriate care for victims, determine the need for transport to hospitals, and communicate with C-MED and area hospitals. The duties of all response personnel are further described in detail in Section II-B.

B. DUTIES AND RESPONSIBILITIES

This Section details the duties and responsibilities of the Fire Department Incident Commanders, Environmental Coordinator, Fire Department Dispatcher and all other departments and personnel involved in responding to an incident.

1. Duties of the Initial Observer

The Initial Observer of the spill or incident must respond as follows:

- If possible, stop or limit the effect of an incident through timely and routine action without endangering personal safety.

- Always notify the Fire Department immediately at 5-1111, even if the spill, fire, explosion, or other hazard seems small. Tell the Dispatcher:

  - Name of person reporting and telephone number.
  - Where the incident is located (i.e. building and column number).
  - What the nature of the emergency is, and if there are any injuries.
  - What material is involved .
  - How much material is involved (if known)

2. Duties of the Fire Department Dispatcher

The Dispatcher's job is to initiate emergency activities. The Dispatcher will:

- Dispatch the Fire Department and Incident Commander to the scene of the incident and notify security headquarters to assist in area control.

- Contact the Environmental Coordinator and inform him of the information provided by the Initial Observer.

- Handle all requests for assistance by the Responding Fire Officer/Incident Commander.

- Provide technical support, appropriate handling and response data and procedures, as necessary, to the Incident Commander based upon information transmitted to the Dispatcher regarding the incident and the Dispatchers review of available reference material at the dispatchers location.

- Notify Industrial Hygiene & Safety of the location of the incident and the type of material involved so that appropriate monitoring equipment will be employed.

3. Duties of the Responding Fire Officer/Incident Commander

The responding Fire Officer or Incident Commander directs and coordinates emergency activities in response to a fire, explosion, spill, or other hazard. The steps to be taken can be summarized as follows:

- When applicable, activate internal facility alarms or set up communications systems to evacuate any and all personnel who may be endangered by the incident. Security personnel will assist in an evacuation.

- Contain the incident to limit the extent of hazard to human health and the environment and initiate appropriate remedial action, as in Section IV, within the capabilities of available trained personnel and equipment. This may include stopping processes and operations, collecting and containing spilled material, and removing or isolating containers.
- If operations must be stopped, the Incident Commander must monitor for leaks; pressure build up; gas generation; or ruptures in valves, pipes, or other equipment.

- Notify the dispatcher of the need for Medical personnel in the event of

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

OMB No. 2050-EPA-01

For EPA Regional Use Only

EPA

United States Environmental Protection Agency
Washington, DC 20460

Hazardous Waste Permit Application

Part A

(Read the Instructions before starting)

For State Use Only

Date Received
Month Day Year

I. ID Number(s)

A. EPA ID Number	B. Secondary ID Number *(If applicable)*
CTD990672081	

II. Name of Facility

PRATT & WHITNEY

III. Facility Location *(Physical address not P.O. Box or Route Number)*

A. Street

400 MAIN STREET

Street *(continued)*

City or Town	State	ZIP Code
EAST HARTFORD	CT	06108-

County Code *(If known)*	County Name
	HARTFORD

B. Land Type *(enter code)*	C. Geographic Location		D. Facility Existence Date
	LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*	Month Day Year
P	41 45 00	72 38 01	1930

IV. Facility Mailing Address

Street or P.O. Box

SAME

City or Town	State	ZIP Code
		-

V. Facility Contact *(Person to be contacted regarding waste activities at facility)*

Name *(last)*	*(first)*
ROSENBERG	ROBERT

Job Title	Phone Number *(area code and number)*
DIRECTOR F&S	203-565-2689

VI. Facility Contact Address *(See instructions)*

A. Contact Address Location	A. Contact Address Mailing	B. Street or P.O. Box
X		

City or Town	State	ZIP Code
		-

EPA I.D. Number *(enter from page 1)*: CTD990672081

Secondary ID Number *(enter from page 1)*:

VII. Operator Information *(see instructions)*

Name of Operator: UNITED TECHNOLOGIES CORP

Street or P.O. Box: ONE FINANCIAL PLAZA

City or Town: HARTFORD

State: CT

ZIP Code: 06101-

Phone Number *(area code and number)*: 203-728-7000

B. Operator Type: P

C. Change of Operator Indicator: Yes [ ] No [X]

Date Changed: Month / Day / Year

VIII. Facility Owner *(see instructions)*

A. Name of Facility's Legal Owner: SAME AS OPERATOR

Street or P.O. Box:

City or Town:

State:

ZIP Code:

Phone Number *(area code and number)*:

B. Owner Type:

C. Change of Owner Indicator: Yes [ ] No [ ]

Date Changed: Month / Day / Year

IX. SIC Codes *(4-digit, in order of significance)*

Primary	Secondary
3724 *(description)* Jet Engine Manufacturer	*(description)*
Secondary	**Secondary**
(description)	*(description)*

X. Other Environmental Permits *(see instructions)*

A. Permit Type *(enter code)*	B. Permit Number	C. Description
R	CTD990672081	RCRA Part B Permit Application
N	CT0001376	NPDES
N	CT0001376	NPDES Renewal
E	SP000019 1	Sanitary Permit
E	92-176	Sanitary Permit Renewal
E		Stormwater Discharge Application
E	53-0020	CT Emissions Permit
E	53-0047	CT Emissions Permit
E	53-0051	CT Emissions Permit

UNITED TECHNOLOGIES
PRATT&WHITNEY

400 Main Street
East Hartford, Connecticut 06108

X. Other Environmental Permits (see *Instructions*)

A. Permit Type (enter code)	B. Permit Number	C. Description
E	53-0049	CT Emissions Permit
E	53-0055	CT Emissions Permit
E	53-0019	CT Emissions Registration
E	53-0020	CT Emissions Registration
E	53-0021	CT Emissions Registration
E	53-0038	CT Emissions Registration
E	53-0039	CT Emissions Registration
E	53-0040	CT Emissions Registration
E	53-0041	CT Emissions Registration
E	53-0208	CT Emissions Registration
E	53-0042	CT Emissions Registration
E	4000-006	CT Water Diversion Registration
E	4000-007	CT Water Diversion Registration
E	4000-008	CT Water Diversion Registration
E	4000-009	CT Water Diversion Registration
E	4006-006	CT Water Diversion Registration
E		Biannual Hazardous Waste Transporter's Permit
E	CT-HW-264	CT Transporters Permit
E	SMB-151	NRC Materials License
E	06-07522-02	NRC Materials License

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
C T D 9 9 0 6 7 2 0 8 1	

XI. Nature of Business (provide a brief description)

Manufacture Jet Engines and Parts

XII. Process - Codes and Design Capacities

A. PROCESS CODE - *Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in Item XIII.*

B. PROCESS DESIGN CAPACITY - *For each code entered in column A, enter the capacity of the process.*

1. AMOUNT - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process unit.*

2. UNIT OF MEASURE - *For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.*

C. PROCESS TOTAL NUMBER OF UNITS - *Enter the total number of units used with the corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	DISPOSAL:	
D79	INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY
D80	LANDFILL	ACRE-FEET OR HECTARE-METER
D81	LAND APPLICATION	ACRES OR HECTARES
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	STORAGE:	
S01	CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS
S02	TANK	GALLONS OR LITERS
S03	WASTE PILE	CUBIC YARDS OR CUBIC METERS
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	TREATMENT:	
T01	TANK	GALLONS PER DAY OR LITERS PER DAY
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR
T04	OTHER TREATMENT (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundment or incinerators. Describe the processes in the space provided in Item XIII.)	GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
GALLONS PER HOUR	E
GALLONS PER DAY	U
LITERS	L
LITERS PER HOUR	H
LITERS PER DAY	V
SHORT TONS PER HOUR	D
METRIC TONS PER HOUR	W
SHORT TONS PER DAY	N
METRIC TONS PER DAY	S
POUNDS PER HOUR	J
KILOGRAMS PER HOUR	R
CUBIC YARDS	Y
CUBIC METERS	C
ACRES	B
ACRE-FEET	A
HECTARES	Q
HECTARE-METER	F
BTU's PER HOUR	K

EPA I.D. Number (enter from page 1): C T D 9 9 0 6 7 2 0 8 1

Secondary ID Number (enter from page 1):

XII. Process - Codes and Design Capacities (continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

Line Number	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	C. PROCESS TOTAL NUMBER OF UNITS	FOR OFFICIAL USE ONLY
X 1	S 0 2	600	G	0 0 2	
X 2	T 0 3	20	E	0 0 1	
1					
2	S 0 1	59,400	G		
3	S 0 2	96,000	G		
4	S 0 3	800*	Y		
5					
6					
7					
8					
9					
10					
11					
12					

NOTE: If you need to list more than 12 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for additional treatment processes in Item XIII.

XIII. Additional Treatment Processes (follow instructions from Item XII)

Line Number (enter numbers in sequence with Item XII)	A. PROCESS CODE	B. TREATMENT PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. TREATMENT PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	C. PROCESS TOTAL NUMBER OF UNITS	D. DESCRIPTION OF PROCESS
	T 0 4				
	T 0 4				
	T 0 4				
	T 0 4				

* One-time short-term storage of excavated

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
C T D 9 9 0 6 7 2 0 8 1	

XIV. Description of Hazardous Wastes

A. EPA HAZARDOUS WASTE NUMBER - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. ESTIMATED ANNUAL QUANTITY - *For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C. UNIT OF MEASURE - *For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that processes that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "000" in the extreme right box of Item XIV-D(1).*
3. *Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).*

2. PROCESS DESCRIPTION: *If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
2. *In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.*
3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS (1) PROCESS CODES (enter)	D. PROCESS (2) PROCESS DESCRIPTION (if a code is not entered in D(1))
X 1	K 0 5 4	900	P	T 0 3 D 8 0	
X 2	D 0 0 2	400	P	T 0 3 D 8 0	
X 3	D 0 0 1	100	P	T 0 3 D 8 0	
X 4	D 0 0 2				Included With Above

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 12-31-91
GSA No. 0246-EPA-OT

EPA I.D. Number (enter from page 1): C T D 9 9 0 6 7 2 0 8 1

Secondary ID Number (enter from page 1):

XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES (1) PROCESS CODES (enter)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	F007	370	T	S01 S02	
2	F008				Included with Line 1
3	F009				"
4	P010				"
5	P015				"
6	P029				"
7	P030				"
8	P098				"
9	P104				"
10	P105				"
11	P106				"
12	D001	6600	T	S01 S02	
13	D002				Included with Line 12
14	D003				"
15	D004				"
16	D005				"
17	D006				"
18	D007				"
19	D008				"
20	D009				"
21	D010				"
22	D011				"
23	U133				"
24	U134				"
25	U188				"
26	U201				"
27	F001	370	T	S01 S02	
28	F002				Included with Line 27
29	F003				"
30	F004				"
31	F005				"
32	U002				"
33	U019				"

EPA I.D. Number (enter from page 1)												Secondary ID Number (enter from page 1)													
C	T	D	9	9	0	6	7	2	0	8	1														

XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES (1) PROCESS CODES (enter)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
21	U021				Included with Line 27 on previous page
22	U031				"
23	U032				"
24	U044				"
25	U052				"
26	U055				"
27	U056				"
28	U077				"
29	U080				"
30	U108				"
31	U112				"
32	U117				"
33	U121				"
34	U122				"
35	U138				"
36	U140				"
37	U144				"
38	U151				"
39	U154				"
40	U159				"
41	U161				"
42	U165				"
43	U210				"
44	U211				"
45	U220				"
46	U223				"
47	U226				"
48	U228				"
49	U239				"
50	F006	6000	P	S01 S02	
51					
52					
53					

EPA I.D. Number (enter from page 1): C T D 9 9 0 6 7 2 0 8 1

Secondary ID Number (enter from page 1):

XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES (1) PROCESS CODES (enter)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	D 0 1 8	40,000	P	S 0 1 S 0 2	
2	D 0 2 2				Included with Line 1 above
3	D 0 2 8				"
4	D 0 2 9				"
5	D 0 3 5				"
6	D 0 3 7				"
7	D 0 3 9				"
8	D 0 4 0				"
9	D 0 4 3				"
10	D 0 0 4	1	T	S 0 1 S 0 2	
11	D 0 0 5				Included with Line 10 above
12	D 0 0 6				"
13	D 0 0 7				"
14	D 0 0 8				"
15	D 0 0 9				"
16	D 0 1 0				"
17	D 0 1 1				"
18	D 0 1 2				"
19	D 0 1 3				"
20	D 0 1 4				"
21	D 0 1 5				"
22	D 0 1 6				"
23	D 0 1 7				"
24	D 0 1 9				"
25	D 0 2 0				"
26	D 0 2 1				"
27	D 0 2 3				"
28	D 0 2 4				"
29	D 0 2 5				"
30	D 0 2 6				"
31	D 0 2 7				"
32	D 0 3 0				"
33	D 0 3 1				"

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

EPA I.D. Number (enter from page 1)												Secondary ID Number (enter from page 1)											
C	T	D	9	9	0	6	7	2	0	8	1												

XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES (1) PROCESS CODES (enter)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	D032				Included with Line 10 on previous page
2	D033				"
3	D034				"
4	D036				"
5	D038				"
6	D041				"
7	D042				"
8	U210	800*	Y	S03	
9	U220				Included with Line 8 above
10	U226				Included with Line 8 above
11	U228				Included with Line 8 above
12	U239				Included with Line 8 above
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
32					
33					

* One-time short-term storage of contaminated soil.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form approved. OMB no. 2050-0034 Expires 12-31-91
CSA no. EPA-OT

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
C T D 9 9 0 6 7 2 0 8 1	

XIV. Description of Hazardous Waste (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 6.

Line Number	Additional Process Codes (enter)

XV. Map

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

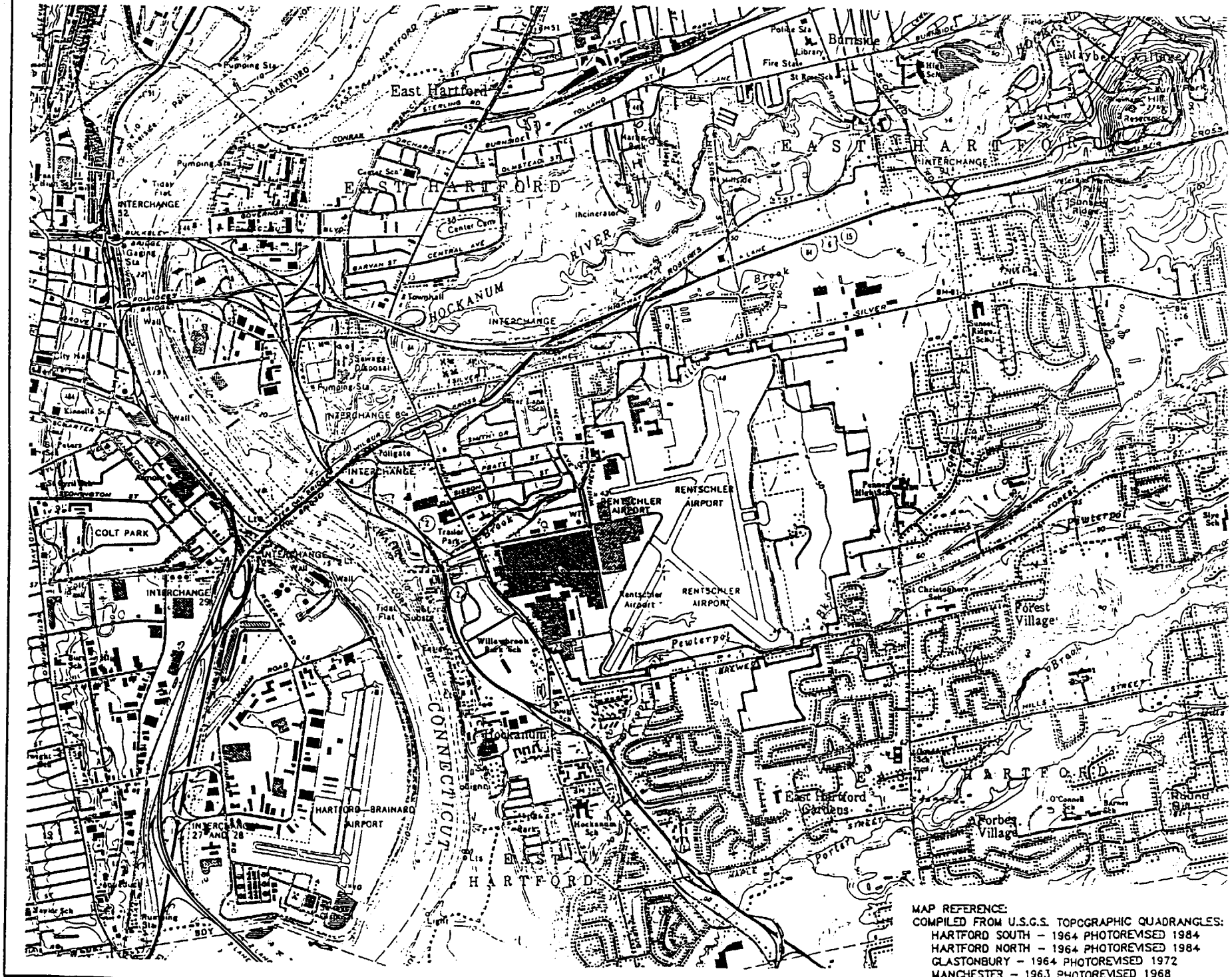
XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

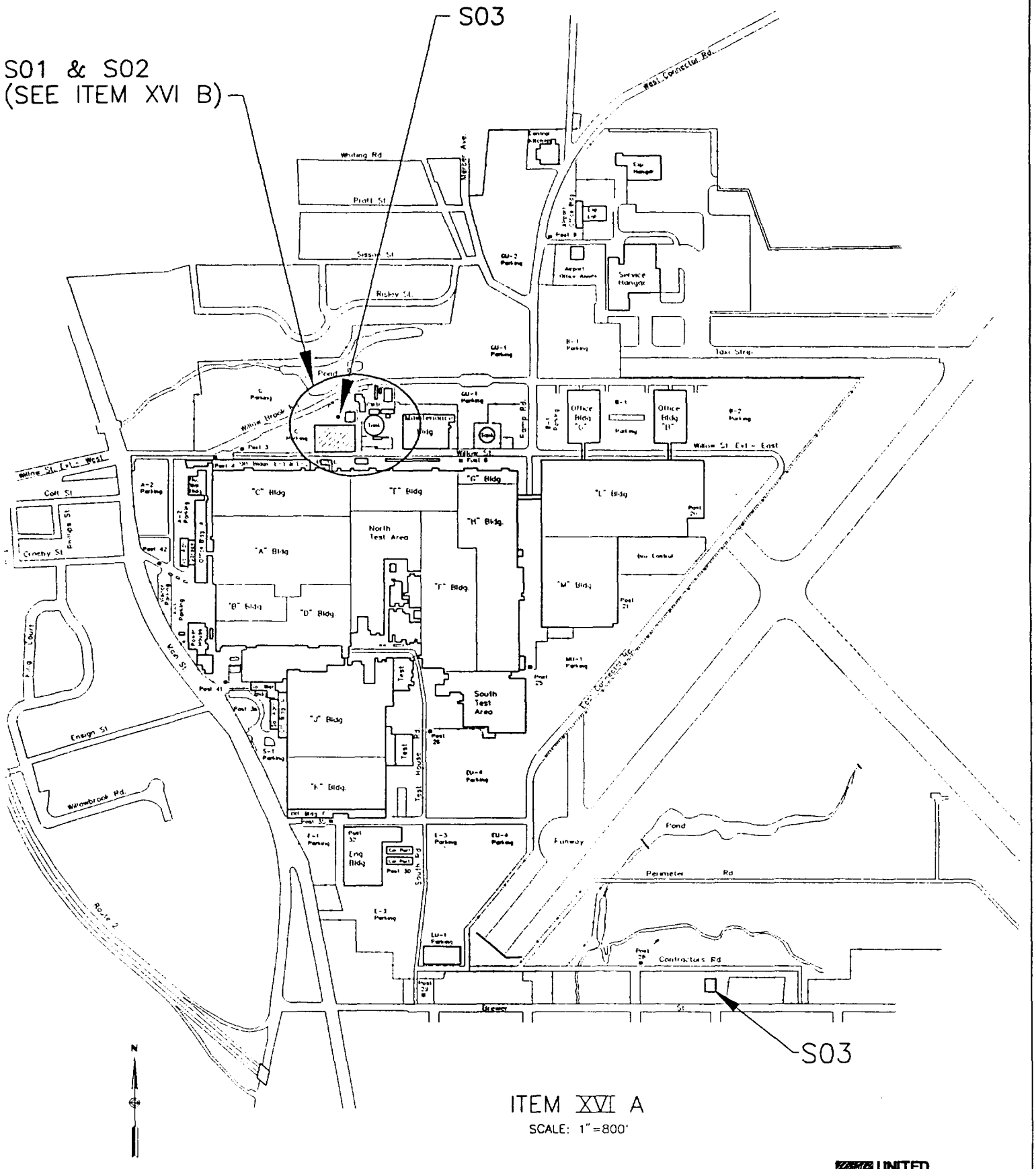
Owner Signature	Date Signed
Robert D Rosenberg	11/20/93
Name and Official Title (type or print): Robert D. Rosenberg, Director, Facilities & Services	
Operator Signature	Date Signed
Name and Official Title (type or print)	

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)



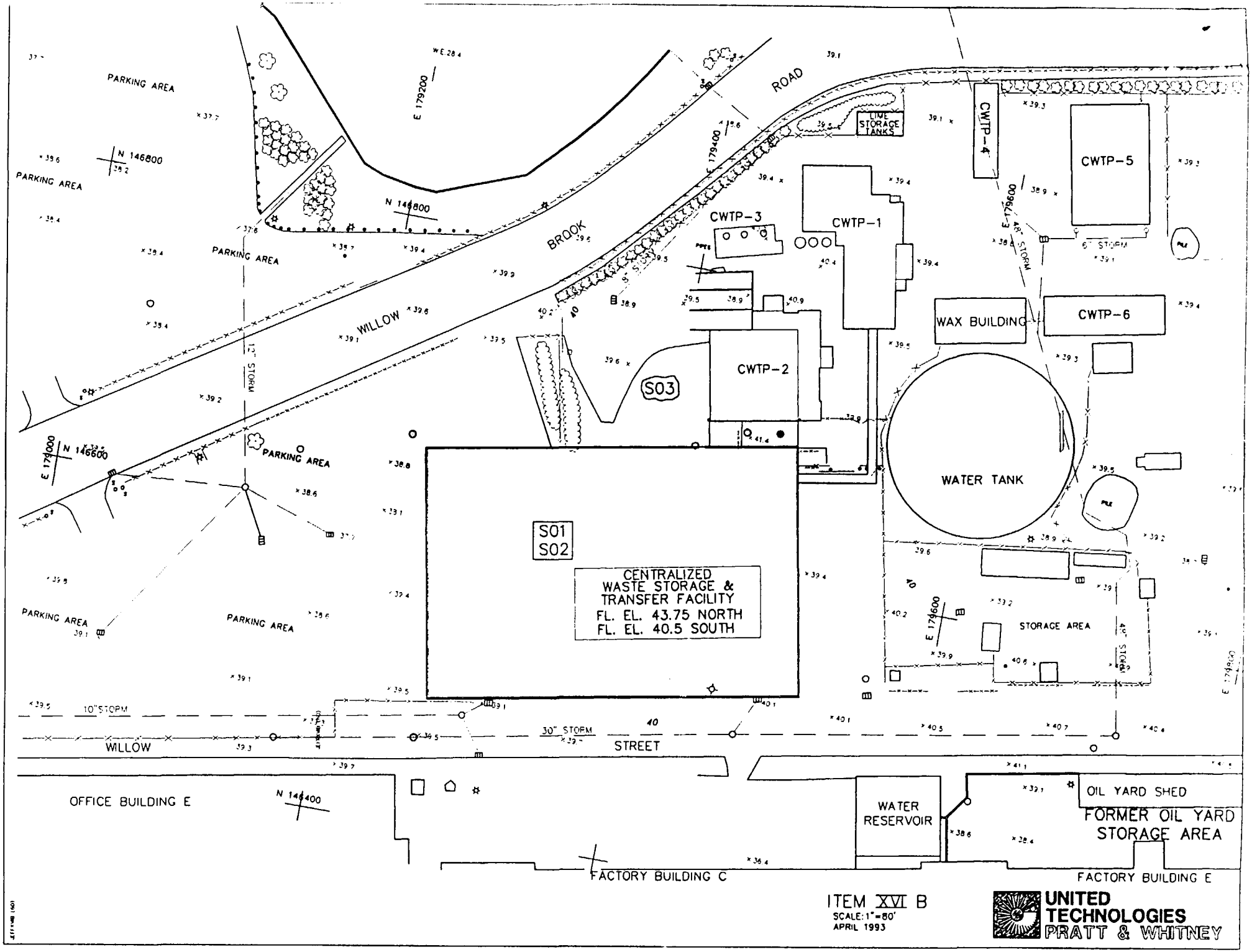
MAP REFERENCE:
COMPILED FROM U.S.G.S. TOPOGRAPHIC QUADRANGLES:
HARTFORD SOUTH – 1964 PHOTOREVISED 1984
HARTFORD NORTH – 1964 PHOTOREVISED 1984
GLASTONBURY – 1964 PHOTOREVISED 1972
MANCHESTER – 1963 PHOTOREVISED 1968



ITEM XVI A

SCALE: 1" = 800'

UNITED TECHNOLOGIES PRATT & WHITNEY



ITEM XVI B
SCALE: 1"=80'
APRIL 1993

UNITED TECHNOLOGIES
PRATT & WHITNEY

UNITED TECHNOLOGIES PRATT&WHITNEY

400 Main Street
East Hartford, Connecticut 06108

October 15, 1993

DEC 0 19
Waste Management
Engineering & Enf

State of Connecticut
Department of Environmental Protection
Waste Management Bureau
165 Capitol Avenue
Hartford, CT 06106

USEPA - Region I
TC Permit Applications - HRR-CAN3
JFK Federal Building
Boston, MA 02203-2211

ATT: David Nash, Director
Waste Engineering & Enforcement Division

RE: RCRA Part A Permit Application
400 Main Street, East Hartford, CT
CTD990672081

Dear Mr. Nash:

We are hereby transmitting a revised RCRA Part A Permit Application for the referenced facility. The Application has been revised to reflect the following:

1. A temporary onetime soil pile was created during the removal and replacement of the underground storage tanks in the Concentrated Waste Treatment Plant Area. The soil stockpile was located East of CWTP-2. The soil which was stockpiled was characterized as non-hazardous and disposed of at the East Hartford solid waste landfill under a special waste disposal authorization from the Department of Environmental Protection (CTDEP). Closure of this stockpile is included in the Closure Plan for the CWTP Area currently being processed by the CTDEP. (56)

2. A temporary onetime soil pile was created during removal and replacement of underground storage tanks at the site. Impacted soil resulting from potential releases from some of the tank systems was characterized and disposed of as hazardous waste. The soil stockpile was located on the South side of Rentschler Airport, North of Brewer Street. A stand alone Closure Plan has been prepared and submitted to the CTDEP for this soil stockpile.

3. Inclusion of the former Oil Yard container storage area which was located along the North wall of "E" Building. This area was identified in the original Part A Permit Application for the East Hartford Facility. The area routinely handled a variety of oils and solvents (typically product) possibly including waste solvent and/or waste oil/solvent mixtures. Closure of this area has been addressed in the Closure Plan for the CWTP Area currently being processed by the CTDEP.

4. Current status with regards to other environmental permits as required in Section X of the application.

None of the units referenced above are currently being used to manage hazardous waste nor are we planning to use these units to manage hazardous waste in the future. As noted above, all three areas are slated to undergo closure once the corresponding Closure Plans have been approved.

Should you have any questions or comments regarding this matter, please do not hesitate to contact Dave Lis at 557-0905.

Sincerely,

Robert D. Rosenberg
Director, Facilities & Services

Enclosure

cc: John Podgurski, Chief, CT Waste Regulation Section
Lynn Clune, Waste Engineering & Enforcement Division

d-d2g